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**FINAL**

# **ENVIRONMENTAL IMPACT STATEMENT**

## **NUCLA-TELLURIDE TRANSMISSION LINE PROJECT**



**FOREST  
SERVICE**  
DELTA, COLORADO

GRAND MESA, UNCOMPAHGRE AND  
GUNNISON NATIONAL FORESTS



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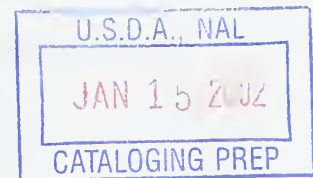
**VOLUME III**  
November 2001



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**FINAL**

**ENVIRONMENTAL IMPACT  
STATEMENT**

**NUCLA-TELLURIDE TRANSMISSION LINE PROJECT**

**VOLUME III**

**Response to Comments on DEIS**

Grand Mesa, Uncompahgre, and Gunnison National Forests  
2250 Highway 50  
Delta, Colorado 81416

**November 2001**



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## RESPONSE TO COMMENTS

### INTRODUCTION

#### SCOPE

Volume III of the Nucla-Telluride Final Environmental Impact Statement (FEIS) contains the comments received during the Draft EIS (DEIS) review period. This volume consists of:

- ♦ Section 1.0 - A content analysis summary of who responded and the major issues raised in the public comments,
- ♦ Section 2.0 - A User's Guide to finding responses to comments and related information in Volumes I and II.
- ♦ Section 3.0 - A summary of comments and general responses by FEIS Volume I Chapters and Sections
- ♦ Section 4.0 - Individual responses to all substantive comments

Changes and new information in FEIS Volume I, are highlighted in the text and tables. Only those Volume II Plates that have been changed are included in the FEIS as errata.

#### COMMENT PERIOD

The DEIS for the Nucla-Telluride Transmission Line Project was released for public review on March 31, 2001. The USFS announced the public comment period in local newspapers and regional media in March 2001, and in the Federal Register, Vol. 66, No. 62, March 30, 2001 (Notice of Availability, EIS No. 010095). The comment period extended until May 31, 2001. In total, 61 days were available for public review and comment.

### SECTION 1.0 CONTENT ANALYSIS SUMMARY

#### WHO COMMENTED

In total, 85 comment letters and e-mails were received during the public review period.

- **Federal Agencies** -- Comments were received from 3 federal agencies, including Army Corps of Engineers, Department of Energy, and Department of the Interior.
- **State Agencies** -- Comments from 2 state agencies were received including the Colorado Division of Wildlife and the Colorado Department of Transportation.
- **County Agencies** - No substantive comments were received from either Montrose or San Miguel Counties.
- **General Public** - 80 comments were received from special interest groups and private citizens. Special interest groups include the Sheep Mountain Alliance, the San Miguel Energy Resource Group, Friends of Naturita Canyon, Norwood Gardens Homeowners Association, Ptarmigan Ranch Owners Association, and Wilson Mesa Homeowners Association. Tri-State Generation and Transmission Association (Tri-State) and San Miguel Power Association (SMPA) also provided comments. The remainder of comments was made by private citizens.



## ISSUES RAISED MOST OFTEN

The following issues were raised most often in comments on the DEIS:

1. Impacts to scenic quality and public and private views
2. Impacts to property values and land uses
3. Potential for undergrounding and associated costs of underground versus overhead transmission systems
4. Tri-State's Undergrounding Policy
5. Effects associated with changes to SMPA's distribution system and substations
6. Legal status of the existing 69 kV easements
7. Purpose and need
8. Range of alternatives
9. Biological resource effects
10. Water and wetland effects
11. Public health and safety

## SECTION 2.0 USER'S GUIDE

### HOW COMMENTS HAVE BEEN RESPONDED TO

Each comment letter and e-mail has been reviewed and responded to in the FEIS, Vol. III, Section 4.0. In accordance with the Council on Environmental Quality's (CEQ) NEPA regulations 40 C.F.R. §1503.4(b), comments have been responded to in a variety of ways including:

- ◆ Providing responses to substantive comments
- ◆ Evaluating new alternatives
- ◆ Incorporating new information
- ◆ Supplementing and modifying the substantive environmental analysis
- ◆ Making factual corrections to the text, maps and figures
- ◆ Acknowledging commenters opinions. Comments that are limited to opinions are noted, but require no additional responses

### HOW AND WHERE TO FIND RESPONSES TO YOUR COMMENTS

Table 2.2-1 provides a guide for finding responses to comments received from federal, state and local agencies, special interest groups and private citizens (see pages 13-16). This table is organized to show:

- ◆ **Who provided comments.** The listing is organized alphabetically within general classifications of federal, state, local agencies, and special interest groups and private citizens.
- ◆ **The identification codes for letters and e-mail comments.** Each comment letter or e-mail has been given an identification number. Within each letter or e-mail, alphabetical codes have also been assigned for individual or separate comments.

Responses have been prepared for each letter/e-mail and for the individual comments raised in each.

- ♦ **A summary of how the comments have been responded to.** For each letter or e-mail, the table shows how the comments have been responded to. This table also summarizes where additional information may be found in the FEIS Vol. I text, Volume II plates, and Volume III General Responses to Comments.

## SECTION 3.0 SUMMARY OF COMMENTS BY FEIS VOL. I CHAPTERS AND SECTIONS

Section 3.0 provides a summary of the comments by EIS chapter. This section provides general responses to issues raised, and directs the reader to specific comments and responses on a given issue.

### CHAPTER 1.0 PURPOSE AND NEED FOR ACTION

A number of commenters questioned the purpose and need for the project. Specific issues raised included:

- ♦ Dependency on coal-related technology and related scope of analysis
- ♦ The project's loop service objective
- ♦ The capacity of the existing 69 kV line
- ♦ Whether the project is needed for growth
- ♦ Whether the purpose and need for the project had been independently reviewed as part of the EIS analysis.

**Dependency on Coal-Related Technology.** Several commenters (Comment letters 8, 10, 11, 15) indicate that dependency of coal-related technologies is unacceptable and that the EIS should address the impacts of coal mining, power production and transportation of power from generation facilities to the project area.

**General Response 1.** *The Council on Environmental Quality (CEQ) regulations for the implementation of NEPA prohibit the segmentation of 'connected actions' which exist if an action:*

- (i) Automatically trigger(s) other actions that may require environmental impact statements,*
- (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously,*
- (iii) Is an interdependent part of a larger action and depends on the larger action for its justification. (40 CFR§8 1508.25(a)(1))*

*The proposed project is not dependent on, nor will it trigger other actions, such as permitting of new coal plants, or increasing production at existing plants beyond permitted levels (e.g. at the Nucla Generating Station). Consequently, the proposed transmission line project is considered to be an independent action that is not 'connected' to mining or the transportation of coal under NEPA guidelines.*

**Transmission Loop System.** Comments (Comment Letter 15) were received regarding the perceived lack of disclosure in the DEIS that the proposed project would create a loop transmission system between the Nucla Generating Station and the Hesperus Substation.



**General Response 2.** *The proposed project will complete a 115 kV transmission loop for power movement between the Nucla Generating Station and the Hesperus Substation. The loop system that will be created by the proposed transmission line has been discussed previously as part of the NEPA scoping meetings and is shown in Vol. II, Plate P&N 1. For purposes of clarification, the DEIS Volume I text has been modified in the FEIS. The loop system created by the Nucla-Telluride transmission line will provide two benefits to Tri-State and SMPA's customers: (1) it will provide an alternative path for power during periods of congestion on the regional grid, and (2) will provide a separate path for backup power to the Telluride region.*

**The capacity of the existing 69 kV transmission line.** Tri-State (Comment Letter 6) has stated that the existing 69 kV would not be able to provide 26 MW of power under emergency conditions since the line could not be operated at below 90 percent of normal voltage levels for more than 20 minutes.

**General Response 3.** *This clarification has been incorporated in the FEIS Vol. I text.*

**Whether the project is needed for growth.** A number of comments (Comment Letters 11, 14, 15, 37) questioned whether the project is needed for growth, and whether other options, such as energy conservation, could meet the project goals.

**General Response 4.** *Chapter 1.0 of the DEIS sets forth the purpose and need for the project. The Nucla-Telluride Transmission Line Project is needed locally for backup power reliability to the Telluride Region, and regionally for load serving capacity in southwestern Colorado and for bulk power transfers. The Nucla-Telluride line is not the primary source of power for the Telluride region. The DEIS, Section 1.3.2, states the Hesperus-Telluride 115 kV Line is the primary source of power for the Telluride Area, and this line has sufficient capacity (32 MW) to meet the area's growth and related power demands for the foreseeable future. Other alternatives are discussed below in General Response 9.*

**Whether the Purpose and Need had been independently reviewed.** Comments (Comment Letter 37) were received regarding whether the DEIS had independently reviewed the need for the project and SMPA's growth projections.

**General Response 5.** *As part of the EIS analysis of purpose and need, AESC independently reviewed Tri-State's regional purpose and need and whether the project was consistent with the Western States Coordinating Council's (WSCC) operating guidelines for the TOT2A system in the southwestern United States. AESC concluded that Tri-State's regional planning studies and project objectives are consistent with these criteria guidelines. SMPA's power demand projections for the Telluride Area were also independently reviewed and compared to the growth rates projected in the Telluride Area Land Use and Transportation Report (October 1998). Both sets of projections assumed similar rates of growth, approximately 3 percent annually. Consequently, SMPA's projections are considered reasonable and consistent with the rates of growth anticipated in local county and city planning studies.*

## CHAPTER 2.0 ALTERNATIVES INCLUDING THE PROPOSED ACTION

**Changes to the Project Description and Alternatives.** Tri-State (Comment Letter 6) has indicated that the DEIS contains inaccuracies regarding the average transmission pole heights. Tri-State has stated that the average pole heights will be 70 feet, rather than 80 feet. Tri-State has further stated that the average pole heights for a modern or present-day 69 kV system would be 56 feet, 5 inches, rather than the 70 feet reported in the DEIS.

In their comment letter (Comment Letter 7), SMPA describes changes to their proposed distribution system. SMPA has stated that additional (approximately 4 miles) distribution

lines would need to be constructed between the Nucla Substation and SR 145 and in the vicinity of the Oak Hill and Norwood Substations. SMPA also has stated in their comment letter that they would prefer to remove an existing distribution line between the Nucla Generating Station and SR 145, rather than the existing 69 kV line.

**General Response 6.** *The project description changes to the 115 kV transmission system and distribution system have been incorporated throughout the FEIS, Vol. I and Vol. II text and analyses. See FEIS Volume I, Section 2.2.1, Figures 2.2-1, and Vol. II Plates Project-3, 4, 5, 6 and 7. These changes affect a number of sections of the FEIS, as well as the comparison of the proposed project with upgrading the existing 69 kV line to a present day 69 kV system (Vol. I, Section 2.3.2). Changes have also been made to the Project Construction Schedule to reflect delays in the project approval process (Section 2.2.1.3 and Appendix A-1). These changes do not substantially affect the findings of the FEIS, however.*

**Status of SMPA's Easements and Easement Restrictions.** Comments (Comment Letters 45, 82) question the legal status of SMPA's easements along the existing 69 kV line and the lack of rights vested in SMPA or Tri-State to make changes to the transmission system.

**General Response 7.** *SMPA's existing easements for the 69 kV line vary along the route. For purposes of the EIS, the existing 69 kV transmission line is considered as part of the affected environment. The impact assessments did not assume existing easement rights, however. Since the status of SMPA's easements are variable and were undocumented at the time of the EIS analyses, the EIS assumed that Tri-State would need to acquire totally new rights-of-way for the 115 kV transmission line. Tri-State would acquire easements necessary for the 115 kV transmission line during final design and prior to construction. Easement issues would be addressed and negotiated between Tri-State and the landowners during this process. A copy of Tri-State's standard easement agreement has been incorporated in the FEIS as Appendix A-4.*

**Related Projects.** SMPA (Comment Letter 7 and a subsequent letter dated August 13, 2001) has stated that the Wilson Mesa and/or Specie Mesa substations may need to be enlarged to approximately 1 acre in size in the near future due to load growth in the region.

**General Response 8.** *These future substation projects are not part of the proposed Nucla-Telluride Project since they are needed for load growth in SMPA's service area. As described in General Response 4, the proposed 115 kV transmission line is needed locally for backup reliability, and will not be the primary power source for Telluride or surrounding areas. Since these future SMPA actions are reasonably foreseeable, however, they are incorporated in the FEIS Volume I, Cumulative Effects sections for Land Use (3.8.2.4), Visual Resources (3.10.2.4) and Socioeconomics (3.11.2.5).*

**Range of Alternatives.** A number of comments were received regarding the range of alternatives considered in the DEIS. The types of alternatives discussed in comment letters, e-mails and follow-up meetings include:

- ♦ Alternative Technologies and Conservation Measures
- ♦ Undergrounding across Beaver Mesas
- ♦ A San Miguel River Canyon Alternative
- ♦ Refinement in Underground Location Across Specie Mesa

**General Response 9.** *Each of the alternatives raised during scoping and during the DEIS public comment period have been considered and are addressed in the FEIS. CEQ NEPA Regulation (40 C.F.R. §1502.14) requires that an EIS evaluate a 'reasonable' range of alternatives. Reasonable alternatives are those that meet all or most of the project objectives and may be feasibly carried out based on technical, economic, environmental and other factors. NEPA does not require the consideration of alternatives that do not meet the basic project objectives, or could only be implemented after significant changes*



in governmental policy or legislation. The CEQ's guidelines for the implementation of NEPA were used to determine a 'reasonable' range of alternatives addressed in an EIS. The following summarizes how and why various alternatives were considered or not.

**Alternative Technologies and Conservation** - Alternative technologies suggested (Comment Letter 15) include local generation, consumer scale generation, efficiency legislation, peak limiting incentives, and shifting cooking/heating to natural gas. Conservation was also suggested as a way to avoid the need for the project.

**General Response 10.** Local generation is addressed in the DEIS and FEIS under the Distributed Generation scenarios. Consumer scale generation was considered and eliminated early on since it would not meet most of the project objectives, including increasing capacity for regional load growth and power transfers. Similarly, efficiency legislation was eliminated since this type of approach would not meet the basic regional and local project objectives, and could only be implemented after significant changes in governmental policy or legislation. Peak limiting incentives would also not meet the regional or local needs for the project. While peak limiting incentives may extend how long the existing 69 kV line could provide backup power to Telluride, this alternative would fail to provide adequate backup power in the long-term, given the growth occurring in the Telluride region. Finally, the alternative of shifting cooking/heating to natural gas would similarly not meet the regional needs for the project. With respect to local reliability, this type of alternative might extend how long the existing 69 kV line could meet local reliability needs, however, significant changes in existing building codes and/or local regulations would be required. This alternative was consequently eliminated since regional needs would not be met, and significant changes in government regulations would be required. Finally, it should be noted that alternative technologies and conservation would not address, nor remedy, the deterioration of the existing 69 kV transmission line. Regardless of the other actions that may be taken at the local level to reduce loads in the future, the existing 69 kV line would still be in need of replacement due to its 50+ year age, and the increasing repairs and costs associated with this facility.

**Undergrounding Across Beaver Mesa** - One comment letter (Comment Letter 37) expresses concern about the lack of alternatives across Beaver Mesa.

**General Response 11.** In response to these comments, a subsequent meeting was held with the landowners and their attorney to discuss potential alternatives across Beaver Mesa (meeting, June 28, 2001). Undergrounding was discussed as a potential option, as well as a routing along the San Miguel River (See General Response 12 below). In response to these comments and meeting, the undergrounding subalternative analysis has been expanded in the FEIS to evaluate the potential for undergrounding across Beaver Mesa from Link 13, mile markers 2.6 to 8.2. The results of this analysis are incorporated in FEIS Volume I, Sections 2.2, 3.3, 3.4, 3.5, 3.6, 3.8, 3.10 and 3.11.

**San Miguel River Canyon Alternative** - A routing alternative to crossing Beaver Mesa was also suggested along the San Miguel River Canyon (meeting, June 28, 2001).

**General Response 12.** This alternative has been considered and eliminated from detailed consideration. A routing along the San Miguel River would have significantly greater impacts to sensitive natural resources, public lands, and regionally significant visual resources than crossing Beaver Mesa along the existing alignment. Specific reasons for eliminating a route along the San Miguel River are: (1) the significant visual impacts that would occur along 20 miles of SR 145, that are part of the San Juan Skyway National Scenic Byway and the Unaweep-Tabeguache Scenic and Historic Byway; (2) the potentially significant physical impacts to sensitive riparian wetlands and other biological resources along the San Miguel River corridor, and (3) the direct and indirect impacts to the San Miguel River Canyon Area of Critical Environmental Concern (ACEC) and Special Recreation Management Area (SRA). These impacts would all be avoidable with the existing alignment or underground subalternative.

**Refinement of Underground Alternative Across Specie Mesa** - Comments (Comment Letters 43) have been provided suggesting the underground line follow the Stock Drive Road across Specie Mesa, rather than the existing 69 kV alignment.

**General Response 13.** *This alignment refinement is incorporated by reference into the FEIS. Following the Stock Drive Road across Specie Mesa would result in less impacts to the natural environment than following the existing 69 kV line, since this road could be used for construction vehicles and equipment. The 115 kV line and the distribution lines would most likely need to be installed in trenches outside the road surface, however. Placement of the 115 kV line directly beneath the road surface is considered infeasible and impractical since the line would be subject to potential soil compaction hazards resulting from the movement of heavy equipment and vehicles on Stock Drive Road.*

**Scope of Analysis – Cost Estimates for Underground and Overhead Transmission Systems.** A number of commenters (Comment Letters 39, 41, 44, 45,) questioned the accuracy and level of detail for the overhead versus underground cost estimates. Private landowners questioned whether the right-of-way acquisition costs reflected the land values on the mesas and whether impacts to property values had been included. SMPA (Comment Letter 7) questioned whether the costs of undergrounding the distribution lines across the mesas had been accurately reported. RUS also raised concerns regarding the maintenance and repair costs of an underground 115 kV transmission line cable. RUS has requested that the FEIS disclose the differences in the expected life of the project using the overhead and underground technologies.

**General Response 14.** *Section 40 C.F.R. §1508.14 of the CEQ NEPA regulations limits EIS evaluations of economic and social effects to when they are directly related to a significant physical effect on the environment; cost-benefit analyses are not required. (40 C.F.R. §1502.23)(Bass et al, 2001). Lead agencies may, at their own discretion, however, go beyond the requirements of NEPA and include more expanded social and economic analyses. The Nucla-Telluride Transmission Line Project EIS includes an analysis of social and economic effects that addresses the overall magnitude of costs for overhead and underground technologies as a basis of comparison amongst the alternatives. For purposes of NEPA compliance, cost estimates have been prepared to inform the public and decision-makers on the magnitude of costs associated with each alternative and technology.*

*Cost estimates for the overhead transmission line alternatives were developed by Tri-State and reviewed independently by AESC. Tri-State's DEIS cost estimates were based on industry construction standards and assumed typical construction cost factors. Land acquisition costs were estimated by Tri-State to range from \$1,500.00 to \$7,500.00 per acre, depending on location (Tri-State, April 1999). Right-of-way acquisition costs would be expected to vary from these ranges in selected locations. EIS Socioeconomics Section, 3.11, provides information on the range of property values in San Miguel County (Vol. I, Table 3.11-5). Property values in San Miguel County may range from several thousand to over \$35,000.00 per acre. Property values in Montrose County would be expected to be less overall, and may range between \$1,000 and \$2,000 per acre in typical locales.*

*The DEIS underground cost estimates for the 115 kV cable were based on information provided by Power Engineers for Specie Mesa (Nucla-Telluride 115 kV Transmission Line Project, Cable System Evaluation, November 1998). This information has been subsequently reviewed and updated by Power Engineers in the FEIS, Volume I, Section 2.2.1.4. (See Appendix A-5).*

*General estimates shown in the DEIS illustrate that the costs for an overhead 115 kV transmission line would be approximately \$200,000.00 per mile, compared to \$1.4 to \$1.7 million per mile for an underground cable system. Cost comparisons in the FEIS have been adjusted to remove right-of-way acquisition costs and provide an "apples to apples" comparison with underground technologies. With this adjustment, overhead*



transmission line costs are approximately \$176,000.00 per mile. It is recognized that costs of overhead and underground technologies may vary significantly on an individual property basis due to a variety of factors. Property-specific considerations would include, among others, the property size and location, site specific geotechnical and soils conditions, the unique view characteristics of the property, the manner and location of the transmission line crossing, and to what degree existing easements have been previously granted to SMPA.

It is unnecessary and beyond the scope of the EIS, however, to prepare property-specific cost estimates for overhead and underground technologies that take into account these various factors all along the corridor, since the order of magnitude cost differences among the overhead and underground systems is expected to remain similar to cost data provided in the DEIS. For these reasons, the FEIS cost estimates for the overhead transmission line also do not take into account site specific variations in property values, the legal status of SMPA's easements, or compensation for property value decreases that may occur. Similarly, the cost estimates for the underground cables do not account for all present worth cost variables, such as the increased maintenance costs or replacement value costs associated with underground systems due to their shorter life span.

Based on the number of comments received, the FEIS has been revised to clarify the cost assumptions for the overhead and underground technologies. Modifications to Tri-State's estimates have been made to include the costs of undergrounding SMPA's distribution lines (see Appendix A-1, Table A-4-2). As part of the FEIS, Power Engineers has provided detailed construction cost estimates for undergrounding the transmission line across Beaver, Specie, Wilson and Sunshine Mesas and described maintenance and repair issues (See FEIS, Volume I, Appendix A-5). Information on the potential life of an underground transmission line across San Miguel County's mesas is also included in this assessment (see Vol. I, Sections 2.2.1.1 and 2.2.1.4).

**Tri-State's Policy and Who Should Pay for Undergrounding.** Numerous comments were received regarding Tri-State's Undergrounding Policy and who should pay for undergrounding costs (Comment letters 39, 41, 42, 43, 45, 46, 47, 56, 57, 60, 61, 63, 64, and 79).

**General Response 15.** The DEIS and FEIS disclose Tri-State's policy (EIS Appendix A-2) and the positions of the Forest Service, BLM and RUS regarding this policy. Neither the Forest Service nor the BLM has taken a position regarding this policy nor do these agencies have the authority to decide how the line is financed on private lands. The RUS will be considering funding for the project in its entirety. RUS has reviewed the Tri-State Policy No. 113, Underground High Voltage Transmission Facilities and finds it to be a reasonable and prudent policy. The RUS action will be to consider approving financing for the Project. The financing decision will be based on a review of the Project's technical and economic justification, reliability and environmental issues. Historically, RUS has not provided financing for rural underground transmission facilities.

## **CHAPTER 3.0 THE AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES OF THE ALTERNATIVES**

### **3.1 ANALYSIS APPROACH**

Comments were raised regarding the corridor analysis approach and the 0.5 mile wide corridor width (Comment Letter 49). Comments were also received regarding the perceived lack of consistency in the impact areas amongst various disciplines (e.g. visual, socioeconomics, land use) (Comment Letter 19). Commenters also questioned the validity of several existing federal planning programs, including the Recreation Opportunity Spectrum (ROS) and Visual Resource Management (VRM) classes (Comment Letter 17).



**General Response 16.** *The methodologies used in this EIS are based upon established professional principles and scientific standards. Corridor approaches to transmission line assessments are a standard approach since the final right-of-way will not be identified until final design and right-of-way negotiations are held with individual landowners. Changes to the EIS have been made where necessary to clarify impact areas for the various disciplines. No changes in impacts have been made, however, since impacts are based upon the extent to which various resources may be affected. With respect to existing federal planning programs, it is not within the scope of the EIS to revise these programs, but rather to report on whether the proposed project and alternatives are consistent with the programs' goals and objectives.*

### **3.2 CLIMATE AND AIR QUALITY**

No substantive comments were received during the public review period.

### **3.3 GEOLOGY, PALEONTOLOGY, MINERALS**

No substantive comments were received during the public review period.

### **3.4 SOILS**

No substantive comments were received during the public review period.

### **3.5 WATER RESOURCES**

Comments on the water resources analysis were received from the Army Corps of Engineers (Corps) (Comment Letter 1). Comments were also received from the Environmental Protection Agency (EPA), following the close of the public review period. The Corps comments concerned their jurisdictional authority, the Clean Water Action Section 404 permit process, and the Corps' recommendations that the alternative with the least adverse impacts to the aquatic environment be strongly considered for selection. EPA's comments primarily addressed the potential wetland effects of undergrounding across the mesas.

**General Response 17.** *In response to these comments, changes have been made to FEIS, Vol. I, Section 3.5 and surveys for fen wetlands were conducted in the summer of 2001. One wetland has been identified on Wilson Mesa. This information has been incorporated into the analysis of the underground subalternative in Volume I, Section 3.6.2.4.*

### **3.6 BIOLOGICAL RESOURCES**

Substantive comments on biological resources were received from the Colorado Division of Wildlife (DOW) (Comment Letter 5) and the Sheep Mountain Alliance (Comment Letter 15). Both letters' comments concerned the potential impacts of the project on bird mortality due to electrocution. DOW also identified new lek sites on Beaver Mesa and protection measures for Gunnison sage grouse.

**General Response 18.** *Tri-State has committed to pole designs that will protect raptors from electrocution. Generally, phase-to-phase and phase-to-ground separations on 115 kV transmission lines are sufficient to eliminate the problem of raptor electrocutions. The EIS addresses these pole design issues in Environmental Protection Measures 52 and 56 (Vol. I, Table 2.2-4). New information provided by DOW on the locations of leks on Beaver Mesa have been incorporated into the FEIS analysis, and in the Biological Assessment (BA) currently being reviewed by the U.S. Fish and Wildlife Service. In addition, the results of recent surveys for fen wetlands are included in the FEIS Volume I, Biological Resources Section 3.6.*

### 3.7 CULTURAL RESOURCES

No substantive comments were received during the public review period.

### 3.8 LAND USE

Comments regarding land uses primarily concerned the potential impacts of the transmission line facilities and rights-of-way on private properties and property values on Wrights, Beaver, Specie and Wilson Mesas (See General Response 14).

Other specific land use issues raised during the DEIS public review period include land use impact areas and the quantification of impacts (Comment Letter 19); the potential impacts to the Norwood Gardens Subdivision (Comment Letters 18 and 19); new information regarding SMPA's planned expansion of the Specie and/or Wilson Mesa Substations (Comment Letter 7); and new information regarding potential conflicts with future CDOT employee housing near Deep Creek (Lime) (Comment Letter 4).

**General Response 19.** *Changes have been made to the FEIS to clarify the quantification of impacts within the land use study area (see FEIS Volume I, Section 3.8.2). The Land Use cumulative impacts analysis has also been revised to address other projects planned by SMPA and CDOT (see FEIS Volume I, Section 3.8.2.4). A copy of Tri-State's standard easement agreement has been incorporated in the FEIS as Appendix A-4.*

### 3.9 RECREATION

Comments received regarding recreation primarily concerned the Recreation Opportunity Spectrum classes considered in the analysis (Comment Letter 16).

**General Response 20.** *As noted above in General Response 16, it is not within the scope of the EIS to revise the ROS classes, but rather to report on whether the proposed project and alternatives are consistent with these federal goals and objectives.*

### 3.10 VISUAL RESOURCES

The potential impacts of the project on public and private views and scenic quality were cited numerous times in comments on the DEIS (Comment letters/emails 4, 9, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 41, 42, 43, 45, 46, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 63, 79, 81, 82). The majority of commenters identified their preferences for, or opposition to, various alternatives. Numerous commenters also stated that visual impacts would affect property values and impact the unique scenic qualities of the landscapes. Several commenters questioned the visual impact findings on Wrights Mesa (Comment Letters 17 and 19). One commenter questioned whether the Central Alternative's crossing of Naturita Canyon had been adequately addressed (Comment Letter 17). Tri-State questioned the objectiveness and accuracy of the visual simulations (Comment Letter 6).

**General Response 21. Routing Preferences** - *Comments regarding routing preferences are noted but do not require substantive responses under NEPA.*

**General Response 22. Wrights Mesa Visual Impacts** - *Overall, visual impacts on Wrights Mesa are expected to be less than significant (e.g. moderate) where the existing 69 kV poles would be replaced with the 115 kV poles. Less than significant impacts are anticipated on most of Wrights Mesa since views of the San Juan Mountains (e.g. the Wilson Range) are more distant and generally less dominant, and numerous distribution poles are already part of the visual landscape character. The FEIS findings have been revised, however, to clarify that visual impacts to individual properties may vary*



depending on individual property settings, the presence or absence of scenic views, visibility of the existing 69 kV line and other utility structures, the location of the project with respect to scenic views, viewing distance, etc. In light of the numerous factors that determine the significance of impacts at any given location, impacts to Wrights Mesa have been revised in the FEIS to reflect moderate to high impact levels. This revision acknowledges that some high impacts may occur on Wrights Mesa depending on the unique conditions of individual properties and views. An assessment of visual impacts to all private properties is beyond the scope of this EIS, however, and is unnecessary to the overall comparison of alternatives.

**General Response 23. Visual Impacts of the Nucla-Norwood Central Alternative Crossing of Naturita Canyon.** A commenter noted that the visual resources section did not report the visual impacts for the Central Alternative's crossing of Naturita Canyon (Comment Letter 17). While the DEIS discloses the effects of paralleling the north rim of the canyon for approximately 4 miles, the crossing was not specifically addressed in the visual resources section. Corrections have been made to FEIS Volume I, Section 3.10 to disclose the visual impacts of the Central Alternative.

**General Response 24. Accuracy and Objectiveness of Visual Simulations.** The FEIS, Vol. I, Section 3.10 text and Vol. II, Visual Plates 7 and 8 have been modified to document that the revised average 115 kV pole heights would be 70 feet, instead of 80 feet. No changes to the EIS analysis findings have been made based on this revision.

### 3.11 SOCIOECONOMICS

Socioeconomic comments on the DEIS primarily concerned the potential effects of the project on property values (Comment Letters 18, 46, 47, 61). Comments were also made regarding how distance zones for property value impacts were determined, and the quantification of homes and lots within the various impact distance zones (Comment Letter 19). A number of commenters also requested that the cost estimates for overhead and underground transmission lines be revised to incorporate property values and reductions in value that may result from the proposed project (Comment Letters 39, 45).

**General Response 25. Property Values – Scope of Analysis.** See General Responses 9 and 14 regarding the scope of the EIS economic analysis and approach to cost estimates.

**General Response 26. Impact Areas for Property Value Effects.** As part of the EIS socioeconomic analyses, the results of other similar studies of transmission line effects on property values were reviewed. Previous transmission line studies had concluded that property value effects could occur at distances up to 300 feet away. (Des Rosiers, 1998; Colwell & Foley 1979). The assessment of property value impacts also took into consideration information provided by Telluride Real Estate representatives regarding property values in Telluride and the surrounding areas.

The distance ranges used in the Nucla-Telluride DEIS were based on the results of previous research. The FEIS has been modified, however, to clarify the number of homes and lots potentially affected within different distance zones. Impacts have also been modified beyond the 300-foot zone to acknowledge that property value impacts may occur beyond this distance, depending on scenic quality and viewing conditions (see Section 3.10 and 3.11). Section 3.11 has also been updated to reflect Tri-State's most current proposed construction schedule.

The potential impacts of the project on property values could vary substantially depending upon the unique characteristics of the property, existing property values, the presence or absence of scenic views, the location of the transmission line relative to property boundaries and scenic views, etc. Considerations of individual private property issues are beyond the scope of the EIS. See General Responses 14 and 22.

### 3.12 TRANSPORTATION

The Colorado Department of Transportation (CDOT) commented on CDOT permit requirements, planned road improvements, and planned employee housing near Deep Creek. CDOT also suggested that Tri-State and SMPA avoid construction during Telluride's festival events due to high traffic on SR 145.

**General Response 27.** *New information provided by CDOT has been incorporated into the FEIS, Volume I, Section 3.8 Land Use, and Section 3.8.2.4 Land Use Cumulative Effects.*

### 3.13 NOISE

No substantive comments were received during the public review period.

### 3.14 HUMAN HEALTH AND SAFETY

Comments were received regarding the potential effects of the project on the health of humans, animals and vegetation (Comment Letter 54). One commenter also noted that this analysis addressed a 150-foot wide corridor (Comment Letter 19).

**General Response 28.** *Changes have been made to the FEIS Volume I, Section 3.14 and Appendix C to correct the analysis for a 75' to 100' wide corridor. Responses to comments have been provided for other public health and safety comments.*



**Table 2.2-1**  
**User's Guide to Responses to Comments on the DEIS**

Name	Date	Comment Letter ID Number	Volume III FEIS Response Type*	Volume I and II FEIS References
<b>Federal Agencies</b>				
U.S. Army Corps of Engineers, Nick Mezei	4/15/01	1	1,3,4	Vol. I, Sections 3.5.2.1, 3.6.2.1
U.S. Department of Energy, Lawrence Gollomp	5/9/01	2	6	No change to Vol. I or II
U.S. Department of the Interior, Robert Stewart	5/24/01	3	6	No change to Vol. I or II
<b>State Agencies</b>				
Colorado Division of Wildlife, Ron Velarde	5/7/01	5	3,4	Vol. I, Section 2.2.1.5, Table 2.2.4; Sections 3.6.2.3, 3.6.2.4, 3.10.2.4, 3.11.2.5; Appendix A-1; Vol. II, Plate BIO-2
State of Colorado, Department of Transportation, Carl Watson	5/23/01	4	3	Vol. I, Sections 3.8, 3.8.2.4
<b>Local Agencies</b>				
San Miguel County BOCC, Vern Ebert	5/17/01	84	1,6	No change to Vol. I or II
<b>Special Interest Groups and Private Citizens</b>				
Abrams, Stan	5/17/01	39	1,5	Vol. 1, 2.2.1.1 and 2.2.1.4; Appendix A-5
Allaire, Paul	5/16/01	42	1,6	No change to Vol. I or II
Anderson, Stanley I., Power Value Inc.	5/31/01	19	1,4,5	Vol. I, Sections 3.8, 3.10, 3.14
Apanel, Edward J.	5/17/01	28	6	No change to Vol. I or II
Arvais, Sandra	5/12/01	68	1,6	No change to Vol. I or II
Battersby, Joseph & Beverly McConnell	4/17/01	61	6	No change to Vol. I or II
Berman, Lyle	5/23/01	65	1,6	No change to Vol. I or II
Billings, Susan & Duncan Ferguson	5/17/01	29	6	No change to Vol. I or II
Boyce, David, Intermanagement, Inc.	5/8/01	47	1	No change to Vol. I or II
Campbell, Fred & Terrel		12	6	No change to Vol. I or II
Chambers, Madeline B. & Bruce A.	5/17/01	21	6	No change to Vol. I or II
Conger, Amy & Robert Herschler	5/19/01	58	1	No change to Vol. I or II
Cox, Gloria Gibson, Valerie Jane Gibson & Lavonne Royer	5/17/01	31	6	No change to Vol. I or II
Crouch, Mark	5/31/01	20	6	No change to Vol. I or II
David, Christopher S.	4/3/01	13	1	No change to Vol. I or II
Dubac, Robert	5/12/01	78	1,6	No change to Vol. I or II
Duffield, Priscilla and Deborah	5/24/01	9	6	No change to Vol. I or II
Foley, John David	5/17/01	34	6	No change to Vol. I or II
Friends of Naturita Canyon	5/17/01	16	1,5	Vol. I, Sections 3.10, 3.11
Garceau, Alan	5/29/01	26	6	No change to Vol. I or II
Godfrey, Scott, Norwood Gardens Homeowners Association President	5/29/01	18	1,3,5	Vol. I, Sections 3.10 and 3.11; Appendix A-5
Gray, Lynn	5/17/01	30	6	No change to Vol. I or II
Hartley-Coll, Susan	5/12/01	69	1,6	No change to Vol. I or II
Haynes, Gene & Everly	5/17/01	23	6	No change to Vol. I or II
Haynes, Randy	5/17/01	33	6	No change to Vol. I or II
Haynes, Steven D. & Denise M.	5/17/01	25	6	No change to Vol. I or II
Herrndon, Steve & Grace	5/31/01	14	1,6	No change to Vol. I or II

Table 2.2-1

## User's Guide to Responses to Comments on the DEIS

Name	Date	Comment Letter ID Number	Volume III FEIS Response Type*	Volume I and II FEIS References
Hewson, George & Wallis	5/12/01	67	1,6	No change to Vol. I or II
Hills, Jack	5/23/01	32	6	No change to Vol. I or II
Holm, Kenneth D.	5/20/01	53	1	No change to Vol. I or II
Huber, Pius	5/26/01	50	1	No change to Vol. I or II
Hyman, Leigh & John	5/12/01	72	1,6	No change to Vol. I or II
Irwin, John & Victoria	4/23/01, 5/21/01	43, 44	43: 1,3,4 44: 6	43: Vol. I, Summary and Sections 2.2.1.1, 2.2.1.4; Appendix A-5
Iverson, A. Evan & Karen F. West	5/29/01, 5/12/01	63, 64	Both: 1,6	No change to Vol. I or II
Johnson, Stephen B., Attorney, Bendelow Law Firm representing Agrivance of Colorado, Inc.	5/10/01	49	1	No change to Vol. I or II
Jones, Gary D., Jones Revocable Trust	5/29/01, 5/12/01	52, 77	Both: 1	No change to Vol. I or II
Kammer, Robert & Carol	5/31/01	81	1	No change to Vol. I or II
Kennedy, Thomas	5/31/01	80	1	Vol. I, Sections 3.10 and 3.11
Lawaczek, Elmar & Waltraud	5/22/01	53	1	No change to Vol. I or II
Lupoli Esq., Virginia	5/24/01	85	1	
Margetts, Melissa & Steven Howard	5/12/01, 5/12/01	73, 74	Both: 1,6	No change to Vol. I or II
Mazzocchi, Sandra & Nicholas, President Wilson Mesa Ranch Homeowners Board	51	51	1	No change to Vol. I or II
McWilliams, Stephen D.	5/29/01	62	6	No change to Vol. I or II
Meek, Harper & Kris Bartosiak	4/11/01	38	1,5	Vol. I, Section 2.2; Vol. II, Plates PROJECT-3, PROJECT-4, PROJECT-5, PROJECT-6, PROJECT-7
Millen, Rodney K.	5/22/01	80	1,6	No change to Vol. I or II
Miller, Elizabeth G.	5/12/01	76	1,6	No change to Vol. I or II
Miller, Linda	5/29/01	10	1,6	No change to Vol. I or II
Miller, Philip	5/31/01	11	1,6	No change to Vol. I or II
Milliron, Kelley & Tom Aiken	5/17/01	24	6	No change to Vol. I or II
Moore, J.D.		80	1,6	No change to Vol. I or II
Ornes, James	5/12/01	71	1,6	No change to Vol. I or II
Pfusterschmid, Nikolaus & Regine	5/27/01	50	1	No change to Vol. I or II
Pinto, Michael	5/17/01	22	6	No change to Vol. I or II
Plummer, Jason, Plummer Telluride Associates	5/18/01	80	1	No change to Vol. I or II
Price, H. Charles & Jessie H.	5/30/01	76	1,6	No change to Vol. I or II
Rabb, Kenneth	5/30/01	50	6	No change to Vol. I or II
Roberts, Rob, Ralph & Kimberly	5/8/01, 5/8/01	40, 41	41: 3,4	Vol. I, Sections 2.2.1.1 and 2.2.1.4; Appendix A-5
Rasmussen, Donald, Plateau Exploration, Inc.	4/7/01	80	6	No change to Vol. I or II
Royle, James	5/17/01	36	6	No change to Vol. I or II
San Miguel Energy Research Group, Susan Billings	5/29/01	8	1,6	No change to Vol. I or II
San Miguel Power Association, Gary Norton	5/15/01	7	1,2,3,5	Vol. I, Sections 2.2.1.1, 3.8.2.4, 3.10.2.4, and 3.11.2.5; Vol. II, Plates PROJECT-3, PROJECT-4, PROJECT-5, PROJECT-6, PROJECT-7; Appendix A-1
Sandell, David P. & Gabriel Gandara	4/3/01	62	1,3	Appendix A-4
Schmid, Marvin, Schmid Family Ranch LLC	5/22/01	50	1	No change to Vol. I or II
Sheep Mountain Alliance, Joan May	5/30/01	10	1,6	Vol. I, Section 1.4.2



Table 2.2-1

## User's Guide to Responses to Comments on the DEIS

Name	Date	Comment Letter ID Number	Volume III FEIS Response Type*	Volume I and II FEIS References
Silver, Dean & Sarah Dickson, Fall Creek Consulting	5/30/01	17	1,3,5	Vol. I, Section 3.10
Strong, Scott and Holly	5/17/01	27	6	No change to Vol. I or II
Sunderland, Paul, Attorney, representing Beaver Mesa LLLP	5/24/01	37	1,2,3,4	Vol. I, Sections 2.2.1.1, 2.3.1, 3.3.2.3, 3.4.2.3, 3.5.2.3, 3.6.2.3, 3.8.2.3, 3.10.2.3, and 3.11.2.4; Vol. II, Plates PROJECT-1, PROJECT -8
Swick, Lila	5/17/01	35	6	No change to Vol. I or II
Tucci, Jon-Michael	5/12/01	75	1,6	No change to Vol. I or II
Tueller, Douglas, Attorney, representing Ptarmigan Ranch Owners	5/31/01	45	1,6	Vol. I, 2.2.1.1, 2.2.1.4; Appendix A-5
Tri-State Generation and Transmission Association, Inc., Stephen Fausett	5/31/01	6	1,3,4,5	Vol. I, Sections 2.2.1.3, 2.2.2.3, 2.3.2, 3.10; Vol. II, Plate VISUAL-7, Plate VISUAL-8; Appendix A-1
Vaughn, Augustus G. Jr. & Rebecca	5/29/01	57	1,6	No change to Vol. I or II
Walus, Michael and Lynne	5/12/01	70	1,6	No change to Vol. I or II
Wolff, Wayne, The Wolf Land Co.	4/9/01	48	6	No change to Vol. I or II
<b>*Key to Response Type</b> 1. Providing responses to substantive comments. 2. Evaluating new alternatives 3. Incorporating new information 4. Supplementing and modifying the substantive environmental analysis. 5. Making factual corrections to the text, maps and figures 6. Acknowledging commenters' opinions. Comments that are limited to opinions are noted, but require no additional responses.				



## SECTION 4.0 DEIS COMMENTS AND RESPONSES

**Note to Reviewers:** This section contains copies of the letters and e-mails received on the Draft EIS. Each letter/e-mail is identified by a number in the upper right hand corner. Comments within each letter/e-mail are distinguished by letter designations. Following each letter are the responses to each of the comments.

- |  |                                       |
|--|---------------------------------------|
| 1. ACOE  | 41. Rob Roberts                       |
| 2. Secretary of Energy   | 42. Paul Allaire                      |
| 3. U.S. Department of Interior, Office of the Secretary                    | 43. John G. Irwin                     |
| 4. State of Colorado, Department of Transportation                         | 44. John G. Irwin                     |
| 5. Colorado Division of Wildlife   | 45. Douglas Tueller                   |
| 6. Tri-State Generation and Transmission Association                       | 46. Thomas Kennedy                    |
| 7. San Miguel Power Association  | 47. David Boyce                       |
| 8. San Miguel Energy Research Group (SMERG)                                | 48. Wayne E. Wolff                    |
| 9. Priscilla and Deborah Duffield  | 49. Stephen B. Johnson                |
| 10. Linda Miller   | 50. Marvin Schmid                     |
| 11. Phil Miller  | 51. Sandra Mazzocchi                  |
| 12. Fred Campbell  | 52. Gary Jones                        |
| 13. Chris David  | 53. Elmar Lawaczek, M.D.              |
| 14. Grace and Steve Herndon  | 54. Pius Huber                        |
| 15. Sheep Mountain Alliance  | 55. Kenneth Rabb                      |
| 16. Friends of Naturita Canyon   | 56. Nikolaus and Regine Pfusterschmid |
| 17. Fall Creek Consulting  | 57. August and Rebecca Vaughn         |
| 18. Scott Godfrey, President of the Norwood Gardens Homeowners Association | 58. Bob Herschler and Amy Conger      |
| 19. Stanley Anderson, Power Value, Inc.                                    | 59. Ken Holm                          |
| 20. Mark Crouch  | 60. Jason Plummer                     |
| 21. Madeline B. Chambers   | 61. Joseph Battersby, D.O.            |
| 22. Michael Pinto  | 62. Stephen McWilliams                |
| 23. Everly C. Haynes   | 63. Karen West and Evan Iverson       |
| 24. Kelley Milliron and Tom Aiken  | 64. A. Evan Iverson and Karen West    |
| 25. Steven Haynes  | 65. Lyle Berman                       |
| 26. Alan Garceau   | 66. Rod Millen                        |
| 27. B. Scott and Holly Strong  | 67. George and Wallis Hewson          |
| 28. Ed Apanel  | 68. Sandra Arvisais                   |
| 29. Duncan Ferguson, Walker Ferguson and Susan Billings                    | 69. Susan Hartley-Coll                |
| 30. Lynn Gray  | 70. Michael and Lynn Walus            |
| 31. Valerie Gibson, Gloria Cox and Lavonne Royer                           | 71. Jason Omes                        |
| 32. Jack Hills   | 72. Leigh and John Hyman              |
| 33. Randy Haynes   | 73. Melissa Margetts                  |
| 34. Dave Foley   | 74. Steve Margetts                    |
| 35. Lila Swick   | 75. Jon-Michael Tucci                 |
| 36. James Royle  | 76. Elizabeth Miller                  |
| 37. Paul Sunderland  | 77. Gary Jones                        |
| 38. Harper Meek  | 78. Robert Dubac                      |
| 39. Stanley Abrams   | 79. H. Charles Price                  |
| 40. Rob Roberts  | 80. Jerry Moore                       |
|  | 81. Carol and Bob Kammer              |
|  | 82. David Sandell                     |
|  | 83. Donald Rasmussen                  |
|  | 84. Vern Ebert                        |
|  | 85. Virginia Lupoli Esq.              |

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 REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO  
CORPS OF ENGINEERS  
1325 J STREET  
SACRAMENTO, CALIFORNIA 95814-2922

April 15, 2001

Regulatory Branch (200175116)

Mr. Steve Wells  
U.S. Forest Service  
Norwood Ranger District Office  
Post Office Box 388  
Norwood, Colorado 81423

Dear Mr. Wells:

We are responding to your written request for comments on the NUCLA-TELLURIDE TRANSMISSION LINE -DEIS. The project begins in Section 20, Township 42 North, Range 9 West, and ends in Section 12, Township 46 North, Range 15 West, San Miguel County, Colorado.

In accordance with Section 404 of the Clean Water Act, a Department of the Army permit is required for any discharge (including mechanized land clearing) of dredged or fill material in waters of the United States. Dredged material is material removed from a water of the U.S. and placed back into a waters of the U.S.; fill material is material placed into a waters of the U.S. from another location. Structures which have the effect of fill are also considered fill material. Within the context of Section 404, "waters of the United States" are defined as the territorial seas; perennial and ephemeral streams; lakes, ponds, impoundments; and wetlands. Federal law requires that any individual or entity proposing to discharge into waters of the United States obtain a Department of the Army permit prior to commencing such work. To aid the applicant, we have enclosed a list of wetland consultants who routinely perform wetland delineations and are familiar with the Section 404 permit process.

A cursory review of the Draft Environmental Impact Statement indicates a recognition of wetland regulation under Section 404 of the Clean Water Act. It is less clear whether other waters of the U.S., such as rivers, streams, and impoundments below the level of the ordinary high water elevation have been recognized as being jurisdictional. The Corps recommends that the alternative which will have the least adverse impact to the aquatic environment be strongly considered for selection. Whichever plan is ultimately chosen, discharges into waters of the U.S. must be avoided if practicable. If avoidance is not possible, then impacts must be minimized, and compensated under a Section 404 permit.

NORWOOD DISTRICT			
APR 19 2001			
DISTRICT MANAGER	ACCT.	INFO	TM
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ENV. AD TECH			
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-2-

We have assigned number 200175116 to this project. Please refer to this number if a Department of the Army permit is required on this development project. If you have any questions, please write to Mr. Nick Mezei or telephone (970) 243-1199, extension 12.

Sincerely,

Mr. Nick Mezei  
Engineer  
Southwestern Colorado Regulatory Office

Enclosure

Corps of Engineers, Sacramento District  
402 Rood Avenue, Room 142  
Grand Junction, Colorado 81501-2563

April 3, 2001

### WETLANDS DELINEATION CONSULTANTS

Increasingly, potential applicants for Department of the Army permits are hiring environmental consultants to do wetlands determinations and delineations for them. In addition, because of federal budgetary and work force constraints, we are requesting that many potential applicants have wetlands delineations done by consultants. Under existing constraints, the Corps of Engineers will field verify as many wetlands delineations as possible. We recommend that wetlands delineations performed by consultants be submitted for review and verification at least one month in advance of a submittal of a Department of the Army permit application.

All wetlands delineations will be reviewed to insure compliance with the methodology contained in the Corps of Engineers Wetlands Delineation Manual dated January 1987 and that sufficient information is provided to justify the wetlands/upland boundaries as shown on the delineation map(s). To obtain a jurisdictional determination letter from the Western Colorado Regulatory Office, all consultant-prepared wetlands delineations shall contain:

1. A wetlands delineation map depicting a point-to-point survey of the wetlands boundary as flagged by the consultant in the field. The consultant should review the survey for accuracy before submittal to this office. We prefer topographic maps with contour intervals of one or two feet and at a scale of 1 inch equals 100 feet. However, these specifications may vary depending upon the scope of the delineation and the nature of the project. In certain situations, a point-to-point survey of the wetlands boundary may not be required. However, the boundary must be reproducible in some manner. The consultant should contact this office for approval before submitting a delineation without a point-to-point survey. In all cases, the wetlands boundary must be marked with survey flagging or stakes in the field before this office will conduct a site inspection to verify the delineation. The flags or stakes must be sequentially numbered and those numbers shall appear on the survey for each point;
2. The type(s) of wetlands present, such as riparian willow, wet meadow, marsh, etc., should be shown on the delineation map. The respective sizes in acres of each type should be included either on the map or in a report;
3. The location of all sample sites should be shown on the delineation map(s);
4. Wetlands delineation data forms, or similar data sheets, for each sample site, cross-referenced to the sites should be shown on the delineation map(s). The data for each sample site shall clearly list the indicators for the soils, vegetation and hydrology, and shall include the basis for determining whether the sample site is wetlands or upland. The number of sample sites will vary depending upon the size and shape of the wetlands, the degree of difficulty in differentiating wetlands and upland, width of transition zones, etc.;
5. A site location map, preferably a 7.5-minute USGS quadrangle, shall be included and any other pertinent maps of the site; and
6. A brief written report shall be included with the submittal. This report should list the property owner(s) and/or the developer(s) requesting the delineation. The report shall also describe the nature of the proposed development, and when a permit application will be submitted for the project. Your report should explain the basis for the wetlands boundary location and any problems or questionable areas. The dates of the actual fieldwork should also be included in this narrative.
7. For isolated waters, including isolated wetlands, note in your delineation report any observed and/or documented examples of an interstate or foreign commerce connection.

The Corps of Engineers will acknowledge wetlands delineations that are complete and accurate. In the event that work force constraints preclude timely field verifications, this office may issue a qualified approval. However, prior to definitive regulatory approvals, such as a letter of no federal jurisdiction, nationwide general permit verification, individual permit issuance, etc., wetlands maps will usually be field verified by the Corps of Engineers.



We have attached a field data sheet for photocopying and field use. This form should be used for wetlands delineations subject to Corps of Engineers verification. If you and/or your consultants have questions regarding wetlands delineation procedures, please contact the U. S. Army, Corps of Engineers, Sacramento District in Grand Junction, Colorado at telephone number (970) 243-1199.

The following list of wetlands delineation consultants is arranged alphabetically and should not be interpreted as preferential. This list shall be accepted and used by the recipient with the explicit understanding that the U. S. Government shall not be under any liability at all to any person because of any use made of this list.

Alpine Environmental Services  
8181 County Road 203  
Durango, Colorado 81301  
(970) 385-4138  
Attn: Dr. William Simon

Andrew Antipas Ecological &  
Environmental Consulting, LLC  
0285 Crystal Circle  
Carbondale, Colorado 81623  
(970) 963-8297  
Attn: Mr. Andrew Antipas

Aqua Hab  
10 Town Plaza, #239  
Durango, Colorado 81301  
(970) 259-2623  
Attn: Ms. Corey Sue Derfus

Aquatic and Wetland Company  
1830 17th Street, Suite 100  
Boulder, Colorado 80302  
(303) 442-5770  
Attn: Dr. Jay Windell

Bamberg Associates  
8344 South Everett Way, Unit A  
Littleton, Colorado 80128  
(303) 933-7291  
Attn: Dr. Samuel A. Bamberg

Beattie Natural Resources  
Consulting, Incorporated  
Post Office Box 3526  
Montrose, Colorado 81402  
(970) 240-4627  
Attn: Mr. Kirt Beattie

BIO-ENVIRONS  
1388 County Road 8  
Gunnison, Colorado 81230  
(970) 641-1451  
Attn: Ms. Lynn Cudlip

BIO/WEST, Incorporated  
1063 West 1400 North  
Logan, Utah 84321  
(801) 752-4202  
Attn: Mr. Dennis Wenger

BKS Environmental Assoc., Inc.  
Post Office Box 3467  
Gillette, Wyoming 82717-3467  
(307) 682-3810  
Attn: Ms. Brenda K. Schladweiler

Bluecorn Consulting  
Post Office Box 247  
Delta, Colorado 81416  
(970) 874-0824  
Attn: Dr. David A. Koehler

Brown and Caldwell  
7535 East Hampden Avenue, Suite 403  
Denver, Colorado 80231-4838  
(303) 750-3983

Cedar Creek Associates, Inc.  
916 Willshire Avenue  
Fort Collins, Colorado 80521  
(970) 493-4394  
Attn: Mr. Stephen G. Long

Cirrus Ecological Solutions  
570 East Research Park Way, Suite 108  
North Logan, Utah 81501-2563  
Attn: Dr. Neal Artz  
(435) 787-1490

Dr. David Cooper  
3803 Silver Plume  
Boulder, Colorado 80303  
(303) 499-6441

Dr. Allen B. Crockett  
1060 Cottonwood Circle  
Golden, Colorado 80401  
(303) 443-3282

Dames & Moore  
633 17th Street, Suite 2500  
Denver, Colorado 80202  
(303) 294-9100  
Attn: Dr. Loren R. Hettinger

Earth Resource Investigations, Inc.  
1700 County Road 103  
Carbondale, Colorado 81623  
(970) 963-1356  
Attn: Mr. William N. Johnson

Ecological Resource Consultants, LLC  
4134 Autumn Court  
Boulder, Colorado 80304  
(720) 564-0788  
Attn: Mr. David Blaich

Ecosphere Environmental Services  
2257 Main Avenue, Patio Level  
Durango, Colorado 81301  
(970) 382-7256  
Attn: Mr. Mike Fitzgerald

Ecotone Environmental Consultants  
Post Office Box 3516  
Logan, Utah 84321  
(801) 752-2204  
Attn: Mr. Oliver J. Grah

ENARTECH, Incorporated  
Post Office Drawer 160  
Glenwood Springs, Colorado 81602  
(970) 945-2236  
Attn: Mr. Kerry Sundeen

ERO Resources Corporation  
1842 Clarkson Street  
Denver, Colorado 80218  
(303) 830-1188  
Attn: Mr. Steve Dougherty

ESCO Associates, Incorporated  
Post Office Box 18775  
Boulder, Colorado 80308  
(303) 447-2999  
Attn: Dr. David L. Buckner

Grand Environmental Services  
935 Mountain Avenue, Box 857  
Grand Lake, Colorado 80447  
(970) 627-5464  
Attn: Mr. Geoffrey S. Elliott

Greystone Environmental Consultants  
5231 South Quebec  
Englewood, Colorado 80111  
(303) 850-0930  
Attn: Mr. Ed Fleming

Habitat Management, Incorporated  
3571 East Phillips Circle  
Littleton, Colorado 80122  
(303) 770-9788  
Attn: Mr. Wayne R. Erickson

Harding Lawson Associates  
743 Horizon Court, Suite 106  
Grand Junction, Colorado 81506  
(970) 242-4749  
Attn: Mr. Bruce O. Smith

Hersey Environmental Services  
Post Office Box 1517  
Gunnison, Colorado 81230  
(970) 641-2211  
Attn: Mr. Joe Hersey

Huffman & Carpenter, Incorporated  
5303 Louie Lane, Suite 1  
Reno, Nevada 89511  
(775) 828-1991  
Attn: Ms. Lori Carpenter

IHI Environmental  
640 East Wilmington Avenue  
Salt Lake City, Utah 84106  
(801) 466-2223  
Attn: Ms. Becky Paulson

IME  
Post Office Box 270  
Yampa, Colorado 80483  
(970) 638-4462  
Attn: Mr. Kent A. Crofts

Intermountain Ecosystems  
270 East 1230 North  
Springville, Utah 84663  
(801) 489-4590  
Attn: Mr. Ron Koss

LANDesign  
259 Grand Avenue  
Grand Junction, Colorado 81501  
(970) 245-4099  
Attn: Mr. Robert G. Katzenson

Mr. Rollin M. Lunders  
44190 County Road M.3  
Mancos, Colorado 81328  
(970) 533-7674

Montane Environmental Solutions Limited  
Post Office Box 3611  
Vail, Colorado 81658  
(970) 328-6158 or (970) 468-0450  
Attn: Ms. Nicola Ripley

Mountain Planning and Engineering  
Post Office Box 120  
Fairplay, Colorado 80440  
(719) 836-2480  
Attn: Ms. Andrea Boschee

Nature Tech. Consultant Services Corp.  
2128 Railroad Avenue, Suite 201  
Rifle, Colorado 81650  
(970) 625-8553  
Attn: Mr. Michael J. Villa

Dr. Erik Olgeirson  
4440 Tule Lake Drive  
Littleton, Colorado 80123  
(303) 347-8212

Mr. Jeffrey W. Parker  
Post Office Box 221  
1342 Barber Drive  
Carbondale, Colorado 81623  
(970) 947-5184

Parsons Engineering Science  
1700 Broadway, Suite 900  
Denver, Colorado 80290  
(303) 831-8100  
Attn: Dr. Bruce Snyder

Pentacore EPG  
76 East 6790 South  
Midvale, Utah 84047  
(801) 562-2521  
Attn: Mr. Derrick Smith

PIONEER Environmental Services  
980 West 1800 South  
Logan, Utah 84321  
(801) 753-0033  
Attn: Dr. Roy D. Hugie

Plateau Environmental Services  
3238 East 5th Avenue  
Durango, Colorado 81301  
(970) 247-9200  
Attn: Mr. Mike Matheson

Professional Wetland Consultants  
20 Rim Road  
Boulder, Colorado 80302  
(303) 444-1715  
Attn: Mr. David Steinmann

Queen of the River Fisheries/Aquatic Services  
13810 North 115 Street  
Longmont, Colorado 80501  
(303) 651-2514  
Attn: Mr. Michael J. Mitchell

Rangeland Resources  
0049 Pinon Drive  
Glenwood Springs, Colorado 81601  
(970) 9471855  
Attn: Mr. Larry Robinson

Resource Management  
Post Office Box 3296  
Telluride, Colorado 81435  
(970) 728-6848  
Attn: Dr. David P. Groeneveld

RG Plans, Incorporated  
Post Office Box 2575  
Telluride, Colorado 81435  
(970) 728-0646  
Attn: Mr. Richard H. Grice

San Miguel Forestry Consultants  
Box 883  
Telluride, Colorado 81435  
(970) 728-5603  
Attn: Mr. Philip S. Miller

Savage and Savage  
464 West Sumac Court  
Louisville, Colorado 80027-2227  
(303) 666-7372  
Attn: Mr. Michael Savage

Science Applications International Corp.  
8100 Shaffer Parkway, Suite 100  
Littleton, Colorado 80127  
(720) 981-2414  
Attn: Mr. Robert Henke

Science Applications International Corp.  
2109 Air Park Road SE  
Albuquerque, New Mexico 87106  
(505) 247-8787  
Attn: Mr. Charles J. Burt

Smith Environmental, Incorporated  
2625 West 133<sup>rd</sup> Circle  
Broomfield, Colorado 80020  
Attn: Mr. Peter L. Smith  
(720) 887-4928

Southwestern Riparian Specialists  
Box 265  
Mancos, Colorado 81328  
Attn: Mr. Jim Siscoe  
(970) 533-7584

Steigers Corporation  
6551 South Revere Parkway, Suite 250  
Englewood, Colorado 80111-6411  
(303) 799-3633  
Attn: Dr. William O. Steigers

Stony Ridge Environmental Consulting  
Post Office Box 188  
Lake City, Colorado 81235  
(970) 944-4117  
Attn: Ms. Camille Richard

Sugnet & Associates  
2260 Douglas Boulevard, Suite 160  
Roseville, California 95661  
(916) 782-9100  
Attn: Mr. Paul Sugnet

Sugnet & Associates  
Colorado Field Office  
1060 Main Avenue, Suite 020  
Durango, Colorado 81301  
(970) 259-9595  
Attn: Mr. Paul Sugnet

Thomas & Thomas  
614 North Tejon Street  
Colorado Springs, Colorado 80903  
(719) 578-8777  
Attn: Mr. Parry Thomas

TRC Mariah Associates, Incorporated  
605 Skyline Drive  
Laramie, Wyoming 82070-8909  
(307) 742-3843  
Attn: Ms. Karen O. Coppinger

Walsh Aquatic Consultants, Inc.  
9560 Carr Street  
Westminster, Colorado 80021  
(303) 456-9247  
Attn: Dr. William A. Walsh

Walsh & Associates  
255 Main Street  
Grand Junction, Colorado 81501  
(970) 241-4636  
Attn: Mr. Edward M. Baltzer

Walsh Environmental Scientists &  
Engineers, Incorporated  
4888 Pearl East Circle, Suite 108  
Boulder, Colorado 80301-2475  
(303) 443-3282  
Attn: Mr. Grant Gurnee

Watershed Environmental Consultants, Inc.  
Post Office Box 3722  
Eagle, Colorado 81631  
(970) 328-4364  
Attn: Ms. Daiva Katieb

Western Bionomics, LLC  
Post Office Box 882046  
Steamboat Springs, Colorado 80488  
(970) 879-8545  
Attn: Mr. Bob Magnuson  
(970) 870-9031  
Attn: Mr. Kelly Colfer

Western Ecological Resource, Incorporated  
711 Walnut Street  
Boulder, Colorado 80302  
(303) 449-9009  
Attn: Mr. David Johnson

Western Environment and Ecology, Inc.  
1229 North 23<sup>rd</sup> Street, Suite 205  
Grand Junction, Colorado 81501  
(970) 243-4919  
Attn: Mr. Brian E. Crandall



Weston Designers and Consultants  
5301 Central Avenue, N.E., Suite 1516  
Albuquerque, New Mexico 87108  
(505) 846-1329  
Attn: Mr. Charles Burt

West Water Engineering  
2516 Foresight Circle, #1  
Grand Junction, Colorado 81505  
(970) 241-7076  
Attn: Mr. Michael Klish

Wetlands Studies Incorporated  
1047 Cara Court  
Carbondale, Colorado 81623  
(970) 379-9955  
Attn: Ms. Allison Cowie

Wright Water Engineers  
2490 West 26th Avenue, Suite 100A  
Denver, Colorado 80211  
(303) 480-1700  
Attn: Mr. David B. Mehan

Wright Water Engineers  
Post Office Box 219  
Glenwood Springs, Colorado 81602  
(970) 945-7755  
Attn: Mr. Bill Lorah

Wright Water Engineers  
143 East 10th Street  
Durango, Colorado 81301  
(970) 259-7411  
Attn: Mr. Paul Avant

1. ACOE

- 1A. The EIS acknowledges that waters of the U.S. including wetlands, rivers, perennial and ephemeral streams, lakes, ponds and impoundments are under the jurisdiction of the ACOE in accordance with the requirements of the Clean Water Act. The FEIS Water Resources Section reflects the ACOE's jurisdiction of these resources under the section entitled 'Applicable Permits, Standards and Ordinances' (Vol. I, Section 3.5.2.1). Determination of impacts to jurisdictional waters and wetlands of the U.S. will be documented during final design. Avoidance of impacts to jurisdictional wetlands and waters of the U.S. will be achieved to the greatest extent practicable during final design, through careful siting of access roads, laydown areas and poles. If avoidance is not practicable, Tri-State will submit the wetlands delineation information required by the ACOE, and coordinate directly with the ACOE to obtain the necessary permits and approvals.

ABSTRACT NUMBER	ACQ. INFO.	INT.
REG. MGMT.		
REG. STAFF		
PROD. STAFF		
LAB. ST. STAFF		
ADM. STAFF		
GEN. MGMT. STAFF		
PHYSICS STAFF		
FILE		

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Dear Mr. Wells,

This is in response to your letter of March 26, 2001, in which you seek the views of the Department of Energy, pursuant to 36 CFR 2251.54(g)(2) with respect to above referenced application.

The Project entails upgrading an existing 69-kV line to 115-kV construction and operation. This upgrade will serve several purposes. First, it will increase the overall load serving capability in the southwest Colorado area. Tri-State has primary responsibility for serving load in the area. Secondly, it will increase the transfer capacity on an existing constrained path. Western, Tri-State and Public Service Company of Colorado (PSCo) all share the transfer capability across the constrained path between Colorado and the Four Corners area known as TOT2A.

The Path is limited based on load in the area north of the boundary, i.e. - the higher the load, the lower the transfer capability. Therefore, adding to the load-serving capability will also increase the transfer capability on TOT2A.

The Tri-State Member load has continued to grow in this area over the past 5 years, and has eroded Western's transfer capability on TOT2A from approximately 420 MW to around 350 MW today. This decrease in transfer capability is a direct result of Tri-State Member load growth, not due to any action of Western. This Project will add between 15-30 MW back into the TOT2A transfer capacity.

The Department of Energy supports any effort Tri-State can put forth in southwestern Colorado to increase its load-serving capability, which directly enhances the regional transfer capability across TOT2A.

We are returning herewith the material that you submitted with your letter.

Sincerely,

Cc:  
Mr. Jack Dodd  
Power Marketing Liaison Office  
Room, 8G-027, Forrestal Building  
1000 Independence Ave., S.W.  
Washington, D.C. 20585

Lawrence A. Gollomp  
Assistant General Counsel

2. Secretary of Energy

2A. Comment noted. No response necessary.





# United States Department of the Interior

# POSTED

3

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Denver Federal Center, Building 56, Room 1003  
P.O. Box 25007 (D-108)  
Denver, Colorado 80225-0007

May 24, 2001

ER 01/263

Garry Edson, District Ranger  
Norwood Ranger District  
P.O. Box 388  
Norwood, Colorado 81423

Dear Mr. Edson:

The Department of the Interior has reviewed the Draft  
Environmental Impact Statement for the Nucla-Telluride  
Transmission Line Project, Montrose and San Miguel Counties,  
Colorado and has no comments.

3A

Sincerely,

Robert F. Stewart  
Regional Environmental Officer

NORWOOD DISTRICT	
MAY 29 2001	
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REC. STAFF	
WILDLIFE CR	
LANDS. MGMT. STAFF	✓ [ ]
REG. AD/TECH	
BLM MGMT. STAFF	
PROMISE CAMP	
FILE	

3. U.S. Department of Interior, Office of the Secretary

3A Comment noted. No response necessary.

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4

## STATE OF COLORADO

## DEPARTMENT OF TRANSPORTATION

Region 5 - Engineering  
3803 North Main Avenue, Suite 300  
Durango, Colorado 81301

(970) 385-1400  
Fax (970) 385-1410



NORWOOD DISTRICT	
MAY 29 2001	
	ACCT. INFO. INT.
DISTRICT MANAGER	
TCE	
VEG. MGMT.	
REG. STAFF	
WILDLIFE	
LANDS. MGMT. STAFF	
PRO AD TECH	
REG. MGMT. STAFF	
PROMISE CARD	
FILE	

May 23, 2001

U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, Colorado 81423

Attn: Steve Wells, Project Manager

Re: Draft Environmental Impact Statement, Nucla-Telluride Transmission Line Project

Dear Mr. Wells,

The Colorado Department of Transportation Region 5 has reviewed the Draft EIS for the proposed project and has the following comments.

Based on our review of the traffic data, the impact of this project on the state highway system should not be significant. Temporary increases in traffic attributable to project construction are not expected to decrease levels of service on the existing highways. However, we do encourage consideration of the heavier summer season tourist traffic in the scheduling of construction activities in order to minimize traffic disruption.

For your information, CDOT will be resurfacing State Highway 145 from Society Junction to Placerville during 2001. Minor widening of S.H. 145 between Telluride and Placerville should be completed by 2005-2006.

With regard to potential direct highway impacts of this project, it is recognized in the DEIS that any utility or access related work involving state highways will require permits from CDOT. This office should be contacted well in advance for obtaining these permits.

In relation to the broader issues of the transmission line alternatives, we would like to emphasize two issues of concern. One relates directly to the existing CDOT Telluride Maintenance facility on State Highway 145 at Deep Creek (Lime). We are in the process of planning for the construction of three new employee residences at this site. These homes will be located between the existing maintenance yard and the San Miguel River. It is important to take these new residences into account during the alternative selection process so that any adverse impacts can be avoided.

4A

4B



Our other major concern in the alternative evaluation process is the potential for visual impacts along Highways 141 and 145. These highways are designated as "Scenic and Historic Byways" by the State of Colorado. They have exceptional scenic, historic, cultural, recreational and natural features. This issue is addressed in the DEIS, and we ask that you give serious consideration to selecting the alternative that will achieve the least adverse visual impacts.

4C

Thank you for the opportunity to review this DEIS. Please contact me or Wally Jacobson at (970) 385-1433 if you have any questions.

Very truly yours,



Carl J. Watson  
CDOT Region 5 Planning/Environmental Manager

WRJ

Cc: Richard Reynolds, CDOT Region 5 Transportation Director  
Mike Perino, CDOT Region 5 Program Engineer  
Ed Demming, CDOT Region 5 Traffic and Safety Engineer  
Wayne Lupton, Section 3 Maintenance Superintendent  
Robin Geddy, CDOT Environmental Programs Coordinator  
Sarah Pearce, CDOT Scenic and Historic Byway Coordinator  
File via Jacobson

#### **4. State of Colorado, Department of Transportation**

- 4A Comments noted. Tri-State will be responsible for obtaining individual permits during the final design of the project.
- 4B. Planned residential at the CDOT Telluride Maintenance Facility has been incorporated into the EIS analysis of land use and cumulative effects.
- 4C. Comment noted. Potential visual impacts are a key issue being considered for this proposal.

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May 7, 2001

5A

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5. Colorado Division of Wildlife

5A. Comment noted.

5B. The additional sage grouse display (lek) sites on Beaver Mesa have been incorporated into the Biological Resources section 3.6 of the EIS and is shown on *Plate BIO-2*. This information has been forwarded to Tri-State. In *Table 2.2.4*, Tri-State's Committed Mitigation Measure 54 has been modified to reflect the construction constraint.

**TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.**

HEADQUARTERS: P.O. BOX 33695 DENVER, COLORADO 80233-0695 (303) 452-6111

May 31, 2001

Mr. Steve Wells  
District Ranger  
Norwood Ranger District  
P.O. Box 388  
Norwood, Colorado 81423

Re: Nucla-Telluride Transmission Line Project  
Tri-State Comments on Draft EIS

Dear Mr. Wells:

Tri-State Generation and Transmission Assoc., Inc. is hereby transmitting comments on the Draft Environmental Impact Statement for the Nucla-Telluride Transmission Line Project. The comments also address items contained in the various public summary reports and are noted accordingly.

Sincerely,

Stephen Fausett  
Senior Vice President  
Transmission

SF:KM:jr

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

A Touchstone Energy Cooperative

CRAIG STATION  
P.O. BOX 1307  
CRAIG, CO 81626-1307  
(970) 824-4411

ESCALANTE STATION  
P.O. BOX 577  
PREWITT, NM 87045  
(505) 876-2271

NUCLA STATION  
P.O. BOX 698  
NUCLA, CO 81424-0698  
(970) 864-7316



Tri-State Comments on Nucla-Telluride DEIS And Related Public Summary Reports1. Page S-2, 4<sup>th</sup> ¶

"Temporarily, the exiting Nucla-Sunshine 69 kV Line could be operated to provide up to 26 MW of power." A footnote should be added that states "Tri-State's operating criteria would only allow voltage drops resulting from using the Nucla-Sunshine 69 kV circuit to support the Telluride loads (26 MW) for no longer than 20 minutes." Tri-State would never operate the system at the 26MW level for longer than 20 minutes because this would result in voltages at or below 90 percent of normal voltage levels. A transmission voltage of 0.90 p.u. causes the utilization voltage (voltage at the outlets) to fall into the Range B emergency classification for normal operation of residential and commercial motors and equipment. Operating motors and electric equipment at the emergency Range B level of voltages causes excessive heating and loss of equipment life. Tri-State's criterion is based on the Rural Electric Administration Bulletin 169-4 and the American National Standards Institute Standard No. ANSI C84.1-1982.

6A

This same footnote should be included in the Underground and Overhead Transmission Design Options Public Summary Report (page 3) and Distributed Generation Alternatives Public Summary Report (page 3).

Additionally in the summary report (Page 2), the word "temporarily" should be inserted and clarified with the above footnote.

6B

Tri-State attempted to clarify this misinterpretation in communication with Mr. Ron Ishii of AESC on April 19, 2001.

## 2. Page 2-30, Section 2.2.2.3 Costs of Generation Alternatives

Tri-State concurs with the general finding in the DEIS that the Distributed Generation (DG) Alternative is substantially more costly than the proposed transmission project. This analysis was detailed in Section 2.2.2.2 of the DEIS and supported by the independent analysis, "Telluride Alternative Distributed Generator Analysis", performed by AESC. However, we wish to point out that this analysis was conservative (i.e. lower in cost) than Tri-State's own estimates of DG cost. We believe that the costs of DG could be as much as \$6,000,000 higher than the AESC analysis based on the following observations:

6C

- The cost of installation in the AESC analysis does not include many items such as shipping, surveying, site preparation, auxiliary substation equipment, training, sales taxes, and permitting. We estimate that these additional items could add as much as \$3,000,000 to \$4,000,000 to the cost of the DG installations.
- The AESC analysis uses a figure of \$8,000 per year for all operations and maintenance (O&M) activities. This figure does not include such items as replacement parts, major and minor overhauls, and sufficient labor to perform

6

regular site inspections, test starts, and other activities associated with turbine-generator operations. This figure appears to be especially low for the later years of the analysis when the DG approaches 2000 hours of operation each year. We estimate that it would require approximately \$275,000 per year for O&M activities and associated indirect (overhead) charges to adequately support the DG installation. The difference in O&M costs on a present-worth basis is approximately \$3,000,000.

6C

We do not wish to be overly critical of the AESC report in the above comments. We found it to be thorough and professional. Rather, we wish to emphasize that the cost figures in the report were somewhat below our own estimates, and the AESC figures reflect a conservative comparison for the DG alternative.

3. Page 2-30, Section 2.2.23, Costs of Generation Alternatives and Comparison to Transmission Alternatives

"...the present value cost for the proposed 115kV line is estimated at \$15,631 (AESC 2000)." Tri-State's estimated cost for the transmission line is listed in Table A-4-2 (Page A-1) as \$12,717,000. The difference is that AESC is a life of project cost, which includes taxes, operation & maintenance, while the Tri-State cost is a first cost or initial capital investment cost. The comment is made to clear up any perception in disparity of transmission costs estimates.

6D

4. Page 2-33 Figure 2.3-1

The 115 kV Single Circuit Structure is noted as having an "Avg. Height: 81 ft." This is in error. The average or typical height of these structures is not the arithmetic mean of the range of possible structure heights. The typical structure height will be 70 feet. This was documented in correspondence dated November 10, 1998 to View Point West which included a drawing of the RUS TP-115 single pole structure as depicted in Figure 2.3-1.

6E

Also, the 69 kV single circuit structure would have a typical or average height of 56.5 ft., not the 72 ft.-3 in. as indicated. Again, the dimensions noted on this Figure are arithmetic means of a range of pole heights that may be used depending on terrain. This figure should be corrected for both notation and scale. The use of "average height of 80 feet" appears numerous times in the DEIS and should be corrected. Errors in average structure heights can be found as follows:

6F

Summary, pages 2, 3, 11, 14, 19 (Figure SUMMARY – 6), 20  
 UG & OH Transmission Design Options, pages 4 & 6  
 Distributed Generation Alternatives, pages 4 & 6  
 DEIS, pages S-16, S-17, 2-6, 2-33

All references to "average" structure heights within these documents should be corrected.

## 5. Page 3.2-12 Section 3.2.2.6, Impacts of Generation Alternatives

Tri-State concurs with the general finding in the DEIS that the Distributed Generation Alternative will impair visibility at Class I and Class II Wilderness Areas. This conclusion was supported by the independent analysis, "Visibility Impact Analyses from Distributed Generation Alternative Emission Report", prepared by McVehil-Monnett. It confirms Tri-State's initial position that with its box canyon location, close proximity to wilderness areas, and current non-attainment status for fine particulate, Telluride is a poor candidate for distributed generation even under limited operation scenarios. We believe that it would be difficult if not impossible to permit a DG alternative in the Telluride area and meet the purpose and need of the project.

6G

## 6. Plates Visual 5-16

Given the height error noted in Comment No. 4 above, has the exaggerated height been used to simulate proposed structures height and appearance? Specifically, in Plate 5 the existing 69 kV poles are scarcely visible in the existing view. By comparison, the simulated 115 kV poles appear to be too thick and high. The shading is valid, but the height and thickness of the pole does not appear to be to scale.

6H



## 6. Tri-State Generation and Transmission Association

- 6A. Comment noted. Footnote has been added.
- 6B. The public summary documents are not being redistributed as part of the FEIS. The DEIS was published and distributed for public review on March 31, 2001.
- 6C. Comments noted. A footnote has been added in Chapter 2.0 to clarify cost assumptions.
- 6D. Comment noted.
- 6E. Three drawings (TP-115, TS-4A, and TS-5A) were provided by Tri-State for the 115 kV single pole structure, and are contained in the EIS, Appendix A-1, *Figure A-1.2-2*. As noted on Tri-State's drawings, pole heights can vary between 65 feet and 97 feet, depending on terrain. The 80-foot average referenced in the DEIS is the arithmetic mean of the range of possible structure heights. This approach was taken since actual pole locations and heights are not available and will not be determined until final design. For purposes of NEPA compliance, the 80-foot average height also allowed for a conservative assessment of impacts. Based on Tri-State's commitment that the 'typical' pole height will be at the low end of this range - 70 feet, references have been changed throughout the FEIS.
- 6F. A drawing was provided by Tri-State for the 69 kV single pole structure as shown in EIS *Figure 2.3-1*. As noted on Tri-State's drawing, pole heights can vary between 56 feet 5 inches and 88 feet, depending upon terrain. The 70-foot average referenced in the DEIS is the arithmetic mean of the range of possible structure heights. This approach was taken since actual pole heights are not available for the DEIS analysis. For purposes of NEPA compliance, the 70-foot average height also allowed for a conservative assessment of impacts. Based on Tri-State's professional opinion that the 'typical' 69 kV pole height would be at the low end of this range - 56 feet, 5 inches, references have been changed throughout the FEIS. This change is also reflected in a revised assessment of the comparative visual impacts of the 69 kV rebuild and the proposed 115 kV transmission line (*see FEIS Section 2.3.2*). As noted in response 6B, the public summary documents were not reproduced as part of the FEIS.
- 6G. Comment Noted.
- 6H. EIS, Volume II, *Plates VISUAL-7* and *VISUAL-8* have been modified to reflect Tri-State's statement that 'typical' pole heights for the proposed 115 kV transmission line will be 70 feet, rather than 80 feet. With respect to *Plate VISUAL-5*, this key observation point is from 11.30 Road, approximately one mile south of the Nucla-Norwood Central Alternative. While the existing 69 kV transmission line poles can be easily seen with the naked eye, the camera (35mm with 50 mm lens) is unable to capture the viewer's perception at this distance. It should be noted that simulations are best viewed in the field, where the proposed change can be evaluated directly against the existing view. The simulation of the 115 kV line is based upon engineering CADD analyses and the Hi-Res QFX photographic rendering program. In rendering the photograph, the thickness of the poles is also limited by computer pixel size. Consequently, the simulation may show the 115 kV poles somewhat thicker than actual poles would be.

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7

## SAN MIGUEL POWER ASSOCIATION, INC.

A Touchstone Energy™ Partner

5/15/01

Mr. Robert L. Storch, Forest Supervisor  
Grand Mesa, Uncompahgre, and Gunnison National forests  
2250 Highway 50  
Delta, Colorado 81416

Dear Mr. Storch:

San Miguel Power Association, Inc. (SMPA) would like to comment on the draft EIS for the Nucla – Telluride Transmission Line Project. One through six are comments on the EIS. An additional comment is included to defer some new construction and associated environmental disturbance.

7A

1 – SMPA would like to be on record regarding the Distributed Generation option. SMPA will need to keep and maintain the 69 kv line to serve existing distribution loads on Beaver, Specie, Wilson, and Sunshine Mesas.

7B

2 – SMPA has existing distribution underbuild on Plate #4 from Mile marker 5.6 to Mile Marker 6.2 in Link #1. This is also true on Link #1 between 7.2 to 7.3. This is not mentioned in the EIS.

7C

3 – The EIS fails to show the Oak Hill substation being removed. Therefore, existing loads will need to be served by a new 3 phase distribution circuit from the Oak Hill Substation back to a circuit feeding from the Norwood Substation.

7D

4 – SMPA would like to point out that future load growth on Specie and Wilson Mesas will require expansion of one of the substations to 3 phase status and the construction of a 3 phase cross tie to the other substation site.

7E

5 – SMPA feels the plates showing geographic development potential for Oak Hill, Beaver mesa, Specie mesa, Wilson mesa, and Sunshine mesa fail to adequately depict the actual amount of property that is privately owned and may in fact have electrical loads in the future. (See Plate Cumulative 1)

7F

6 – SMPA would like to comment that the cost of burying the 115 circuit would also need to include the cost of burying the existing overhead distribution circuits. SMPA's existing Distribution Underbuild is not addressed in the draft EIS.

7G

Headquarters  
Box 817, Nucla, Colorado 81424  
970-864-7311 • 970-864-7257 FAX

Box 547, Telluride Colorado 81435  
970-728-3825 • 970-728-5287 FAX

Box 523, Ouray, Colorado 81427  
970-325-4434 • 970-325-4685 FAX

Box 419, Silverton, Colorado 81433  
970-387-5711 • 970-387-5711 FAX

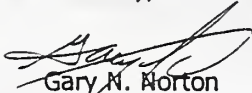


Presently SMPA has a 3 phase overhead distribution line between Norwood and Nucla that parallels the existing 69kv transmission line in several locations. This line was constructed in 1938 & 1939 with small conductor. The growing load and deterioration of this line has required SMPA to start replacing it (SMPA has replaced the section from the Norwood Substation to Link #2 mile marker.8 and the rest of the line is included in SMPA's 10 year Construction Work Plan). SMPA would like to propose to Montrose County, rather than retire all of the existing 69kv transmission line, built in the mid to late 1950s with large conductor between Link #1 mile marker .4 and 6.2, that portions of this transmission line be converted to a distribution line and the paralleling 1938 distribution line be retired instead. By doing this, SMPA will not have to rebuild those sections of the distribution line in the immediate future.

7H

If you have any questions please contact me at (970) 864-7311

Sincerely,

  
Gary N. Norton  
Manager



## SAN MIGUEL POWER ASSOCIATION, INC.

A Touchstone Energy™ Partner 

13 August 2001

Steve Wells  
U.S. Forest Service  
P.O. Box 388  
Norwood, Co 81423

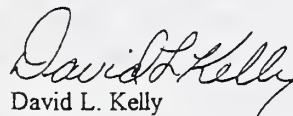
Dear Mr. Wells:

In May of 2001, San Miguel Power Association, Inc. (SMPA) responded to the draft EIS for the Nucla – Telluride 115Kv Transmission Line Project. Item four (4) made reference to future load growth requiring the upgrading of the substations on Wilson and Specie Mesas. Load growth is additional housing development requiring electrical service. Presently SMPA only has single-phase substations with limited capacity on both Specie and Wilson Mesas. One new home requiring three phase electric service or multiple homes needing single-phase electric service could require the construction of a three-phase substation and three-phase distribution circuits. SMPA's present line extension policies require that new line extensions and services be financed by the person requesting them. Three phase facilities can be very costly but, as you know, money does not seem to be an obstacle for some of the development that is occurring in the Telluride region. Predicting when or where a new home will be built, or the size of the electrical service needed, is almost impossible.

Although the upgrading of one, or both, the substations on Wilson and Specie are not a result of the construction Nucla – Telluride Transmission line SMPA wants all parties concerned to be aware that this transmission line will be the source of power for these substations and there is the possibility that one or both substations could be increased in size and appearance.

A three-phase substation would require approximately one (1) acre of ground with an eight (8) foot chain link fence enclosing steel structures, transformer, circuit switchers and a control building.

If I can further clarify any thing on this subject, be sure and call me at 970-864-8118.



David L. Kelly  
System Planner  
San Miguel Power Association, Inc.

Cc: Chris Keller

### Headquarters

Box 817, Nucla, Colorado 81424  
970-864-7311 • 970-864-7257 FAX

Box 547, Telluride Colorado 81435  
970-728-3825 • 970-728-5287 FAX

Box 523, Ouray, Colorado 81427  
970-325-4434 • 970-325-4685 FAX

Box 419, Silverton, Colorado 81433  
970-387-5711 • 970-387-5711 FAX

## 7. San Miguel Power Association

- 7A. Comment noted. The Large DG Alternative considered eliminating the 69 kV line across the mesas in response to public concerns for visual quality. While eliminating this section of transmission line would be technically feasible, it is understood that it is SMPA's policy and goal to retain this line for future load growth on the mesas. No additional text changes have been made.
- 7B. The EIS, Volume II, *Plate PROJECT-4* shows the sections of the 69 kV transmission line where SMPA would retain the poles for distribution service. The EIS analysis assumes retention of the poles for distribution in these areas. No additional text changes have been made to the FEIS.
- 7C. The EIS, Volume II, *Plates PROJECT-6* and *-7* indicate in the legend that the Oakhill Substation would be removed. This assumption was also set forth in the DEIS in Chapter 2.0, page 2-11 and 2-12, under the discussion of 'Substation Modifications' for the Norwood-Sunshine and Norwood-Telluride Alternatives, respectively. Based upon information provided by SMPA (July 23, 2001 meeting), the FEIS text and maps have been modified to show SMPA's proposed additional three-phase distribution line extension from the Oakhill Substation to the Norwood Substation.
- 7D. System modifications anticipated by SMPA due to load growth in their service area are not part of the Nucla-Telluride 115 kV Transmission Line Project. SMPA's future expansion of the Specie and/or Wilson Substations to three-phase status is incorporated in this FEIS, however, in the applicable 'Cumulative Effects' sections. The substation(s) may be expanded from 0.001 acre to approximately 1 acre in size. This assessment is based on a follow-up letter to the Forest Service that was provided by SMPA, August 13, 2001.
- 7E. The EIS analysis of Cumulative Effects is based on guidance provided by the Council on Environmental Quality (CEQ). Cumulative Impact is defined as: '... the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.' (CEQ, 1508.7). Future conditions in the Nucla-Telluride project area have been evaluated based upon information provided by the Forest Service, BLM, state agencies and San Miguel and Montrose counties on future projects, including approved and pending subdivisions, infrastructure improvements, other power generating facilities currently being permitted, etc. Other private lands, for which no specific plan or proposal has been made, are not considered in the cumulative assessment. While development of these private lands may occur in the future, such actions are not 'reasonably foreseeable' and would be speculative in nature.
- 7F. Comment noted. The cost estimates provided for the EIS assumed \$150,000.00 for overhead distribution system upgrades. Tri-State has revised that estimate to \$630,000.00 to account for the increased costs of undergrounding a new three-phase underground line from the Oakhill Substation to the Norwood Substation, in accordance with the County's permitting requirements. These increases are reflected in the FEIS cost comparison of Alternatives, in Appendix A-1, *Table A-4-2*.
- 7G. SMPA's distribution underbuild is addressed in the EIS. Sections of the 69 kV line that SMPA would retain as distribution were identified early-on in the NEPA process and considered in the environmental analysis. Sections of the 69 kV line to be



retained as distribution lines, and portions of the 69 kV line to be removed, are identified in Volume I, EIS, Chapter 2.0, Section 2.2.1.1, and in Volume II, *Plates PROJECT-3, -4, -5, -6 and -7*. *Figure 2.2-1* and *Table 2.2-2* also provide information on distribution changes. Appendix A-1, Section 2.1 Design Characteristics of Distribution System Modifications describe in detail the distribution system requirements and changes associated with this project. These changes are summarized by alternative in Appendix A-1, *Table A-2.1-1*. With respect to the underground subalternative, it is assumed that the existing distribution line across Specie Mesa would be undergrounded at the same time the 115 kV transmission line is installed underground. Power Engineers has indicated, however, that the distribution line could be placed in the same trench as the 115 kV cables (Power Engineers, 2001). Costs for undergrounding this 3.8-mile section of distribution line has been estimated by Power Engineers to cost approximately \$2,000,000.00 if direct buried in a separate trench.

- 7H. The EIS evaluates the impacts, both adverse and beneficial, of removing the existing 69 kV line between Nucla and Norwood under the Central and Southern Alternatives. The distribution line referenced in this comment is within the corridor, but varies several hundred feet from the 69 kV line in some locales. SMPA subsequently modified this comment to pertain to only Link 0, and Link 1, mile marker 1.1 to 1.8, where the distribution line is north of SR 145. Tri-State's subsequent letter to Montrose County (see attached letter from M. Murray to Richard Gibbons, dated August 28, 2001) documents this change. The FEIS Volume II, *Plates PROJECT-4 and -5* have been changed to show this section of distribution line removal as an alternative to removing the 69 kV poles. The impacts of removing the distribution line, rather than the 69 kV line would be the same, or very similar, in this area.

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San Miguel Energy Research Group  
 attn: Susan Billings  
 PO Box 629  
 Norwood CO 81423

POSTED

8

NORWOOD DISTRICT	
MAY 31 2001	
DISTRICT RANGE	
ICE	
VEG. MGMT.	
REC. STAFF	
WILDLIFE CR	
LANDS. MGMT.	
ISG ADTECH	
ISG MGMT. STAFF	
SPONSOR CLERK	
FILE	

Steve Wells-Project Office  
 United States Forest Service  
 PO Box 388  
 Norwood, CO 81423

May 29, 2001

To Whom it may Concern,

The San Miguel Energy Research Group (SMERG) would like to respond to the Draft EIS for the proposed Nucla-Telluride Transmission Project. The focus of our comments are directed at the Distributed Generation (DG) portion of the Draft EIS. The DG section of the report spent the majority of its appraisal of DG evaluating large systems. The Draft EIS is accurate in describing the resultant financial and environmental impact of these large systems as insupportable. A system sized to meet the needs of our *back up* generation is, however, supportable and preferable. As a local citizens committee SMERGS evaluation of this transmission line upgrade is concerned primarily with the power requirements of San Miguel county. We hold that those requirements be met with reliable, affordable, and environmentally sensitive back up power for the immediate Telluride region. The Draft EIS engineering study of DG sized to meet our regional back up requirements, lends credibility to SMERGS findings; that an emergency backup system of distributed generation which is environmentally sensitive is the most appropriate system for our requirements.

8A

SMERG opposes investment and long term amortization of a coal fired technology infrastructure. Technological advances are a fact of our lives. We now have viable alternatives to the burning of coal for our power needs. Gas turbines, fuel cells, micro turbines, wind, and aggregated or virtual power plants are methods of generation of electricity that are available to us today. It is these forms of generation that offer the best solutions to the need for premium power, power economy, lower pollution impact, capacity requirements, and the best long term use of resources.

8B

SMERG favors alternative avenues of power backup generation for our region. DG is indeed viable and preferable for our back up needs. We would like to see San Miguel county prepare for a cleaner more intelligent future, and retain the freedom to find these solutions. The proposed powerline upgrade commits us for the next 50 years to an aging and globally irresponsible energy plan. SMERG continues to hope that San Miguel Power Association and Tri-State Generation will join with this community in developing a more appropriate solution to our current and future energy needs.

8C

*San Migel Energy Research Group*



**8. San Miguel Energy Research Group**

*(See General Responses 9 and 10)*

- 8A. The EIS evaluates an Emergency Distributed Generation (DG) Alternative that was sized to only meet the backup requirements of the Telluride Area. The analysis concluded that the Emergency Generator Alternative would not be as environmentally sensitive as the proposed project due to several factors. First, the Emergency Generator Alternative would require that the 69 kV line be rebuilt to present day industry standards, thereby resulting in a new transmission system with noticeably taller poles. Increased visual impacts would consequently result across scenic areas of the counties between the Nucla and Norwood substations. Second, the generator would result in additional visual, noise, and air quality impacts in the vicinity of the generator site itself. These effects are discussed in detail in EIS sections 3.2, 3.10 and 3.13. In addition to these environmental issues, the Emergency DG Alternative would be substantially less reliable in the event of an outage and result in short-term outages during system start-up. Finally, the estimated present value cost of an Emergency DG Alternative (24 to 28 million dollars) would need to be financed by SMPA's estimated 10,000 customers, as compared to 16 million dollars (present value cost) for the proposed transmission system that would be spread across the estimated 950,000 population served by Tri-State's members. Smaller generators were eliminated from consideration since they would not meet the local or regional needs.
- 8B. Comment noted. The EIS considers a number of renewable energy sources including hydroelectric, solar, wind and energy conservation. These alternatives were eliminated from detailed consideration for a variety of reasons including capacity limitations (hydroelectric), technology limitations to support the magnitude of backup required (hydroelectric and solar), and environmental limitations (wind). While it is recognized that some of the alternative technologies noted in this comment are applicable to small scale residential and community uses, they do not displace the need for the proposed 115 kV transmission line. Needs set forth by Tri-State include both regional load serving and bulk energy transfer requirements as well as increased local reliability to the Telluride Area. These alternative technologies would not meet the regional needs of the project. Alternative technologies noted in this comment would still require a transmission system to meet regional load serving goals.

It should also be noted that SMPA's customers have a choice in supporting alternative technologies and fuel types. As a participating member of Tri-State's Green Power Program, SMPA and other members choose among specific energy generation technologies through participation in monthly Tri-State Board meetings. Participation is voluntary. Member consumers may sign up with their Cooperative energy supplier to purchase one or more 100-kWh energy blocks monthly. To support the program, Tri-State has long-term contracts with renewable resource developers in Wyoming and Colorado. Currently, renewable resource energy is generated with wind turbines only. Later in 2001, Tri-State plans on adding more renewable resource generating capacity using wind turbine and landfill gas technologies.

- 8C. Comment noted. Although the project will be able to support regional needs for up to 50 years, it will not prohibit local communities from making their own choices regarding the development of emerging energy technologies and sources in the future.

9

Deborah Duffield

NORWOOD DISTRICT			
MAY 24 2001			
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9. Letter from Priscilla and Deborah Duffield

9A Comments noted.



NORWOOD DISTRICT	
MAY 31 2001	
DISTRICT CLERK	
VICE	
VEG. MGMT.	
REC. STAFF	
BUDGET/ECN	
LANDS. MGMT. STAFF	
SWADTECH	
BUS. MGMT. STAFF	
PROMISE CARD	
FILE	

POSTED

10

May 29, 2001

Steve Wells  
USFS  
P.O. Box 388  
Norwood, Colorado  
81423

Dear Mr. Wells:

re. DEIS Nucla-Telluride  
Transmission Line Project

My primary objection this proposal is the stated Purpose and Need in the DEIS. The argument for a new transmission line is seriously flawed and any energy project tied to coal-burning as a primary source of energy is not acceptable.

In our twenty-two years in Telluride the only power outage of consequence was a natural gas outage and now we find out from the Public Utilities Commission it could have been prevented (Times-Journal, 5-28-01).

The present capacity is adequate and in the future if more power is needed it is essential that it be a sustainable source and not tied to technology that pollutes the Four Corners area

Vital services in the Telluride area already have alternative emergency power back up, i.e. Telluride Medical Clinic, Telluride Ski and Golf, and The Peaks. Would an outage affect heated drive ways to trophy homes and Jacuzzis, yes. Perhaps, a momentary inconvenience for guests in Mountain Village, yes. This is not a need nor an emergency.

Tri-state would like to sell power from the Nucla Plant to power consumers outside the region. This is a business decision and the cost should not be born by the local San Miguel Power Association coop members. The historic rural electrification program was a cooperative movement and not premised on making huge profits for energy conglomerates. These issues are not clearly stated in the "Need and Purpose" section. Citizens deserve full disclosure.

The Forest Service, as the lead agency is responsible because the new line would be on public land, but the environmental issues of a new power line are not addressed in this narrow issue. The dependence on coal as an energy source must be examined in its totality, mining, transporting and pollution of the airshed need to be included. Environmental decisions have to be viewed holistically.

Likewise, the economics of the project must be totally revealed. It would seem that the scope of what is needed to make an informed decision is beyond the objective of the DEIS, none the less, a decision with this much impact on our landscape and pocketbooks must be given full examination.

Thank you for this opportunity to comment.

*Linda Miller*

Linda Miller  
Box 883  
Telluride, Colorado 81435

10A

10B

10C

**10. Letter from Linda Miller**

10A. Tri-State's status as a non-profit electric utility is disclosed in Chapter 1.0, Section 1.4 of the EIS. EIS Appendix A-1 provides information on Tri-State's generating facilities and the customers they serve through their 44 members.

10B. The proposed transmission line project is an independent action that is not 'connected' to mining or the transportation of coal under NEPA guidelines. CEQ regulations for the implementation of NEPA describe 'connected actions' as including the following type of actions:

- (i) Automatically trigger(s) other actions that may require environmental impact statements,
- (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously,
- (iii) Is an interdependent part of a larger action and depends on the larger action for its justification.

Actions are not considered 'connected' when the projects would take place with or without the other and thus have 'independent' utility (*see General Response 1*).

10C. NEPA does not require federal agencies to prepare cost-benefit analyses. The Nucla-Telluride EIS contains economic information regarding the order of magnitude of costs associated with the various alternatives, as well as discloses the potential for property value effects. These costs, along with the environmental impacts of the alternatives, are provided in the EIS to assist federal decision-makers in making a decision on the proposed action (*see General Response 14*).

**POSTED**

11

May 31, 2001

Philip S. Miller  
Box 883  
Telluride, CO 81435

Steve Wells  
U.S. Forest Service  
Box 388  
Norwood, CO 81423

Dear Steve:

This letter is to comment on the 115 kv back-up Transmission Line.

My principal concern is about the need for the back-up line. Our region averages less than one hour power outages in any year, so I don't see any need for the line which would result in more environmental disruption of our fast suburbanizing ranch lands besides other negative effects on the environment.

The line would lock our power needs of the future into coal fired electric generation plants causing us to rely on this type of power generation rather than gas which is cleaner, or better yet renewable energy sources such as wind and solar power.

Finally, I am concerned about building the additional coal fired power source infrastructure which serves more real estate development so that we in effect are subsidizing more vacation home development around here that is gobbling up more and more of the wild lands surrounding Telluride.

Sincerely,

*Phil Miller*

11A

*Met  
Deadline 5/2*

NORWOOD DISTRICT		
JUN 04 2001		
	ACCT.	INFO.
DISTRICT (Range)		
TCR		
VEG. MGMT.		
REC. STAFF		
WILDLIFE		
LANDS. MGMT. STAFF		
INFO AD/TECH		
BUS. MGMT. STAFF		
OFFICIALS CASE		
FILE		



**11. Letter from Phil Miller**

11A. See responses to Comment Letter 10.

Comments on the DEIS should be postmarked no later than May 31, 2001 and submitted to the following:

U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, Colorado 81423  
Attn: Steve Wells, Project Manager

If you have any additional questions, please contact Steve Wells, Project Manager at (970) 327-4261 or at [swells@fs.fed.us](mailto:swells@fs.fed.us).

Sincerely,

/s/ Garry W. Edson

GARRY W. EDSON  
District Ranger

Enclosure

Fred & Terrel Campbell  
P.O. Box 659  
Telluride, CO 81435

NORWOOD DISTRICT	
APR 6 2001	
DISTRICT NUMBER	POST. INFO. UNIT
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REQ. STAFF	
APPLIC. PIER	
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Good project, in favor of  
doing what ever it Takes

12A

Joe Campbell

12. Comment from F. Campbell

12A Comment noted.



POSTED

✓ 13

4/19/01



CDFILMIXER@aol.com

To: swells@fs.fed.us

cc:

04/03/01 12:37 PM

Subject: Nucla-Telluride Transmission Line Project

Hi, thanks for sending me a copy of the DEIS for the proposed electrical line. There are all sorts of alternative routes, but across my land is a given. There are possible underground runs, but not of course across my land. This project will definitely have a significant environmental impact upon us, replacing the old supports with larger ones and more and bigger cables. Do I have any choice in this? Who will decide how this goes down? Will I receive any compensation for the extra land (of mine) used, the disruption caused and the indelible damage done in order to provide service for others and profits for others?

13A

Chris David

13. E-mail from Chris David

- 13A. The decision regarding whether to permit the project will be made by a number of agencies including the U.S. Forest Service, the Bureau of Land Management, the Rural Utilities Services, and the Montrose and San Miguel County Commissioners. The Forest Service and BLM will decide whether, and under what conditions, the project will be permitted on Federal lands. The RUS will decide whether to provide financing for the project. Federal agencies will issue their decisions in their respective Records of Decision (RODs), which will be issued in late 2001, after the Final EIS is completed. Permitting the project on private land will be considered by the counties in the autumn/winter of 2001. If permitted, Tri-State will compensate landowners for the project rights-of-way. The FEIS contains information on the project permitting in Section 1.2. Right-of-way acquisition is addressed in Appendix A-1, Section 1.2.3. A copy of Tri-State's standard easement agreement is enclosed with the FEIS in Appendix A-4.

The Herndon Ranch

Grace and Steve Herndon

To: Steve Wells  
 United States Forest Service  
 Box 388  
 Norwood CO 81423

May 31, 2001

POSTED

Subject: Tri-State Generation and Transmission Assn.'s new Nucla-Telluride 115 kv powerline proposal -  
 -DEIS

Dear Steve,

As longtime San Miguel County residents who have been severely impacted by other transmission lines, we have basic concerns about this plan. To begin with, we strongly support the comments submitted by Sheep Mountain Alliance, of which we are members. We also see inadequacies in the EIS, and are particularly critical of the claimed "need" for a new and bigger Nucla-Telluride line.

In particular, we see that in the 20-some years since the 345kv powerline was constructed across the flanks of the Lone Cone and through Herndon family rangeland, the mind-set of the electric power industry has not changed. Industry thinking is the same. It goes something like this: what we do is sell power, so we don't much care for the idea of conserving energy. Instead, we love the term "demand." We love the idea of big power grids, big powerlines that interconnect so that electric power can be wheeled all over the country, ignoring huge line loss issues, among other problems.

Many experts say that smaller power plants with shorter transmission lines are far more practical than huge regional grids and, in the future, should replace the present big-grid system. Tri-State's claim that a new 115kv line is needed to provide reliable service to Telluride is not supported by facts. At one time during the preliminary public discussions on this plan, Tri-State argued that Norwood area service was "unreliable." "Not so," numbers of Norwood residents responded.

Tri-State then switched to other "needs" claims. Telluride, they said, requires more reliable power. Lightning, they acknowledged, was a main cause of power outages, although no solution was offered for that problem. The DEIS dismisses several alternative local power generating possibilities, which are less likely to be knocked out by either lightning or snowslides --which are considered a threat to the existing Hesperus-Telluride line.

Most troubling of all, though, is the electric power industry's determination to stick to its old ways. Now that California's electric power problems have dramatically focused national attention on issues of power supply and "demand," it's time for Tri-State and the rest of the electric power industry to look to alternative ways to manage electric power. Tri-State's Nucla-Telluride 115kv powerline plan is plainly retrograde.

Sincerely,

*Grace Herndon*  
*Steve Herndon*

NORWOOD DISTRICT	
MAY 31 2001	
DISTRICT	
OFFICE	
REC. NO.	
REC. DATE	
FILE NO.	
FILE	

Box 66 • Norwood, CO 81425

970-527-4795

14. Letter from Grace and Steve Herndon

14A. *(See General Responses 9 and 10.)*

14B. The 115 kV transmission line design will include a static line on top of the poles that will provide for increased protection from lightning strikes. This design feature is described in EIS Appendix A-1, Section 1.2.2. The EIS considered and analyzed, in a comparative and substantive manner, the local power generating options for Distributed Generation that were suggested during scoping and the preparation of the EIS. Distributed generation options considered in detail in the EIS would require a rebuilt 69 kV line that would also include a static line for lightning protection.

14C. No response necessary.



POSTED

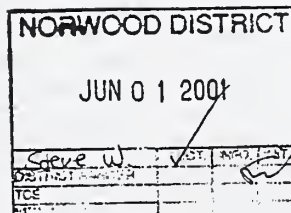
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**Sheep Mountain Alliance**  
 Box 389 • Telluride, Colorado • 81435  
 (970) 728-3729  
 sma@rmi.net

Steve Wells  
 United States Forest Service  
 1150 Forest St.  
 P.O. Box 388  
 Norwood, CO 81423

*Port Muroco  
 5/31/01  
 SW*



May 30, 2001

Re: THE NUCLA-TELLURIDE TRANSMISSION LINE PROJECT

Please consider these as public comments on the record for the Nucla-Telluride Transmission Line Project draft EIS prepared by the USFS (GMUG). These comments are submitted by Sheep Mountain Alliance, a Telluride CO based environmental organization representing local natural and human communities.

First, we commend the efforts of the applicant to efficiently route the proposed transmission line in the most agreeable alignment. However, after review of the DEIS, we think that the document has several deficiencies. For example, the purpose and need stated is not compelling, and has changed throughout the discussion of the project. Initially we were told that the line hopes to replace an aging back-up system. The document states that the purpose and need is primarily to alleviate overloads and increase reliability. Currently our region has more consistent and reliable power than most municipalities in the country. We average less than one hour of power-outages a year. Does that justify a \$16 million line through animal habitat? We have also been told in meetings that the purpose of the new line would be to provide continuous loop service to the four corners region. If this is the case, it should be stated clearly in the purpose and need, and speculations about any ulterior motive of selling power to unregulated areas must be explored and disclosed.

Additionally, the document fails to adequately address alternatives in addition to distributed generation alternatives, nor does it adequately address conservation alternatives, as detailed in our comments below. Finally, the economics presented in the DEIS are incomplete, listing many more of the costs for a distributed generation station than for the power line (e.g. operation and fuel costs.)

Our continued concerns about the DEIS and about the project are delineated in the following specific comments:

1. The DEIS fails to live up to the intent of NEPA in that decision makers must "use all practicable means to identify and assess reasonable alternatives and avoid or minimize any possible adverse effects." (40 CFR 1500.1 f). Reasonable alternatives to this project include: No action, reinforce Ophir pass 115 kv line to secure against outage, rebuild existing Nucla-Telluride line at 44kv or higher voltage, construct new underground line, install local single source generation, install local consumer scale generation, limit consumption via efficiency legislation, create peak limiting incentives, and convert existing electrical heating/cooking/cooling loads to natural gas. Some of these alternatives were viewed in a biased examination (i.e.: local generation was compared to the transmission line without

15A

15B

15

examining the impacts of the power generation/fuel supply/transmission which would feed the new line. All possible problems with underground lines were listed without mentioning the significant bird strike mortality, greater susceptibility to lightning outage, aircraft danger, viewshed contamination, route tree cutting, arsenic leaching from treated wood poles, human access improvements, higher annual maintenance costs and the susceptibility to catastrophic events which comes with overhead lines). A full and fair examination of each possible alternative is the only method for fulfilling the mandates of NEPA.

15B

a. No Action: No quantification is provided for the statement "Power reliability would continue to lessen, however, and human health and safety risks and economic impacts associated with more frequent and longer outages would be expected to occur at some point in the future." SMPA claims improvements in reliability (reduced hours/year of outages) every year. There needs to be an examination of reliability trends before the quoted assumption, on page 8 of the DEIS Summary, can be accepted. If reliability is truly improving, the no action alternative becomes highly attractive. If service reliability is declining, how rapid is the rate of decline and is service really any worse than any other rural cooperative on the Tri State system? Ultimately it is a local decision as to what constitutes adequate reliability.

15C

b. Underground Line: Underground line has significant capacitance and improves system power factor. It eliminates bird strike mortality(1) and nearly eliminates annual maintenance charges. It has a longer service life and is immune to lightning. It eliminates view shed impacts and the route can be turned to avoid sensitive areas. No service road is required.

15D

c. Local Generation: According to Tri State's latest annual report, the utility is installing 3 large combustion turbines(2) to provide for regional load growth. Tri State is also considering constructing a 1000 MW coal fired plant 200 miles East of Telluride(3). The DEIS should consider the impacts of the electrical supply for Telluride (wherever it occurs) and not assume that the supply is without electrical loss or impact. To examine the impacts of local generation only— without examination of the Nucla-Telluride line's proposed electrical supply —is not an apples to apples comparison, especially in a region where more generation is being called for. Compressor stations may not be relevant to a distributed generation plant as the cost of gas delivery is usually included in a negotiated fuel cost. National publications indicate a far lower cost per KW for distributed generation(4) than that given in the DEIS. The Nucla-Telluride Project, when added to the cost of new Tri State generation, will be higher than any of the other alternatives listed on page 21 (figure 7) of the DEIS Summary. Transmission losses will reduce the efficiency of remote generation/transmission and should be included in the revision of figure 7.

15E

d. Consumer Scale Generation: Catalogs such as "Northern"(5) list inexpensive household sized natural gas generators which start, transfer load and stop completely automatically. The cost per KW of capacity is about \$300 and places cost/reliability decisions in the individual consumer's hands. It also transfers the cost of compressor stations to the gas supplier. The Town of Telluride is presently mandating similar generators in newly annexed areas.

15F

e. Efficiency Legislation: Appropriate efficiency legislation could reduce electrical demand increases to amounts below the 30MW year 2015 load forecasted by SMPA.

15G

f. Peak Limiting Incentives: Peak shaving could be performed by various entities equipped with self generation capabilities. Load could be shifted to off-peak periods via economic policy or by voltage/carrier signal controlled switches (dispatchable load) thus maximizing

15H

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utilization of existing electrical infrastructure. Many of these incentives could be promulgated at little or no cost to the ratepayers or public.

15H

- g. Shift Cooking/Heating to Natural Gas: Taxation/permitting powers of local government could be used to mandate gas use for purposes which can be fulfilled by either gas or electricity. This would extend our national gas supply (as it is more efficient to burn gas directly in an 85% efficient furnace than to burn gas in a 30% efficient combustion turbine and transmit the power in a 92% efficient grid) and free up electrical capacity on the existing 44KV line.

15I

2. The Nucla-Telluride Transmission line does not serve the public interest on a cost per delivered kilowatt-hour basis. The economic basis of the project becomes unacceptable if the cost of the project is divided into the few additional kilowatt-hours that the project will actually deliver to Telluride.

15J

3. The "Purpose and Need" statement neglects to mention that Telluride already has 115KV service and that the effect of this project is to go from "tree branch" to "loop feed" service. It is not correct to say that Telluride presently has only 13 MW of supply capacity and will obtain 55 MW if the transmission line is approved; correct supply capacity from the Ophir Pass 115 KV should be included in these calculations. The effect of using the new line for firm regional bulk power transfers may impose limits on local demand at a figure lower than the 55 MW cited in the purpose and need statement; this would be just the opposite increasing Telluride's electrical supply.

15K

4. The DEIS assumes continuance of the SMPA/Tri State monopoly and does not consider the possible future effects of deregulation or the possibilities of local self generation deregulation may engender.

15L

5. Land management agencies often use the disturbance of a transmission line to create a "utilities corridor" under the power line. The effect of creating such a corridor should be examined in any FEIS.

15M

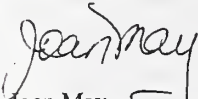
6. The DEIS seems to indicate that this is a permanent easement. If this project is built, we believe that the requisite rights of way should be in the nature of a renewable license of some limited term with an EIS reopener clause to force operating/construction alterations if environmental problems occur or if science produces less impactful methods of power transmission. An adequate reclamation bond should be required.

15N



Thank you for this opportunity to comment on the Nucla-Telluride DEIS. We look forward to your response to our concerns.

Sincerely,



Joan May  
Executive Director

Footnotes:

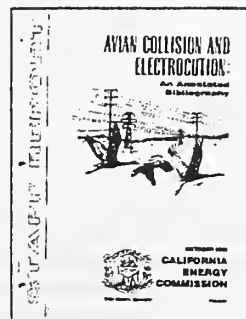
- (1) See: Avian Collision and Electrocutation, An Annotated Bibliography: California Energy Commission, 1995, Publication #P700-95-001
- (2) See: 2000 Annual Report: Tri State Generation and Transmission, Page 7
- (3) See: Coal Plant Comes With Pollution Cost: Denver Post, April 23, 2001
- (4) See: Electric Energy 2000; Rocky Mountain Electrical League, Page 13
- (5) See: Spring 2001 Master Catalog; Northern Tool and Equipment, Page 300



## Avian Collision and Electrocution: An Annotated Bibliography

FOOTNOTE (1)

California Energy Commission  
October 1995  
Publication Number: P700-95-001



Elaine Hebert, Erin Reese, *Principal Authors*  
Lauren Mark, *Contributing Author*  
Richard Anderson, *Project Manager*  
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Robert B. Haussler, *Manager*  
Environmental Protection Office

Robert L. Therkelsen, *Deputy Director*  
Energy Facilities Siting & Environmental  
Protection Division

This document is available from the Energy Commission's publications unit. Please contact them directly for the cost; ask about publication number P700-95-001.

California Energy Commission  
Publications Unit  
1516 Ninth Street  
Sacramento, CA 95814  
Phone: 916-654-5200

### ACKNOWLEDGEMENTS

The work on this annotated bibliography started in 1986 and progressed to completion with the assistance of several hard-working persons. We would like to acknowledge and thank these people for their efforts.

We are grateful to James Estep for the initial literature collection efforts. Over the years, Joan Humphrey, Martin Scheel, Katherine Bodeman-Wadsworth, and Dick Anderson continued the literature search. We could not have gathered such a diversity of books, reports, and articles without the dedicated and professional assistance of Diana Watkins and Mary Chilcote in the California Energy Commission's in-house library. We thank you all for your untiring efforts.

We also extend thanks to Tino Flores and Sue Foster of the California Energy Commission's Graphic

Arts section for the cover design and final report format. We thank Julie Dinsdale for the cover artwork.

Finally, we thank Robert Haussler, James Brownell, Dave Maul and Dick Anderson for their editing assistance and for their support and encouragement throughout this project.

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## PREFACE

This annotated bibliography was initiated as a result of rising concern throughout the world about the losses of birds due to collisions with power lines and other wires, towers, wind turbines, and other structures, and from electrocution by power lines. We hope that the information contained in this bibliography will help reduce these unnecessary losses. This information can be used to improve the planning, structure configuration and design, siting location, and mitigation measures for new projects and for potential retrofit efforts where appropriate. These considerations would result in benefits to world bird populations and assist in avoiding costly delays and maintenance efforts resulting from bird collision and electrocution mortality. As the world's human population grows and development expands into rural and other undeveloped areas, the impact of engineered structures on bird populations becomes increasingly critical. I hope this annotated list will provide assistance to both those involved in the design and siting of these structures and those concerned about bird populations world-wide.

Richard L. Anderson  
Wildlife Biologist  
California Energy Commission  
Sacramento, CA  
September 20, 1995

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INTRODUCTION

USE OF INDICES

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TAXONOMIC INDEX

GEOGRAPHIC INDEX

AUTHOR INDEX

[http://www.energy.ca.gov/reports/avian\\_bibliography.html](http://www.energy.ca.gov/reports/avian_bibliography.html)

5/30/2001

Note about Internet edition. The subject other, taxonomic other, geographic other and author other are not linked to the various documents listed in this bibliography.

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## AVIAN COLLISION AND ELECTROCUTION: AN ANNOTATED BIBLIOGRAPHY

### INTRODUCTION

This project was initiated in response to numerous inquiries regarding avian collisions and electrocution mortalities at human-made structures. Problems caused by avian electrocution and collision with power lines include costly power outages and wildlands fires. These problems can result in expensive maintenance and repair efforts, inconvenience for rate payers, and unnecessary losses of birds. Public concern over these issues can also delay permitting and affect the routing of new facilities. Several state and federal laws may be enforced which could result in costly structural modifications of existing and new facilities.

Concerns regarding the causes and extent of avian mortality, locations of recurring incidents, and potential solutions have not always been adequately considered in the past. This compilation of literature on avian mortality will assist those industry and agency planners and researchers concerned with avoiding and resolving existing and future impacts of projects on avian species.

This bibliography contains entries mainly from 1876 to 1992, and the majority are from the United States. Most entries are taken from journals or periodicals, conference proceedings, government documents, private publications, utility company reports, books, academic theses, and newspaper articles. Copies of all items included in this bibliography are on file in the California Energy Commission's Environmental Protection Office.

Unless otherwise noted, each item was read and annotated. Special attention was given to the following aspects of the reports: numbers of individual birds and species killed or injured, contributing factors, habitat and other locational characteristics, and design features of the structures which resulted in injuries or death.

Other annotated bibliographies on the subject of avian mortality at human-made structures are currently available. Two such documents from the U.S. Fish and Wildlife Service were used extensively for this publication; entries originating therefrom are noted by asterisks ("\*" denotes Avery et al. 1978; "\*\*\*" denotes Avery et al. 1980). The intent for this bibliography is to present an up-to-date compilation of the most significant articles available on the subject; periodic updates and reprinting of this report are planned. Please send notification of additional references and errors to "Avian Collision and Electrocution: An Annotated Bibliography" to the California Energy Commission, MS #40, 1516 9th Street, Sacramento, California 95814, USA. Suggestions to improve the format are also welcome.

Return to Table of Contents.

[http://www.energy.ca.gov/reports/avian\\_bibliography.html](http://www.energy.ca.gov/reports/avian_bibliography.html)

5/30/2001



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## USE OF INDICES

This annotated bibliography contains 468 citations of literature from the United States and other countries. Much of the literature selected discusses avian collision mortality with power lines, wind turbines, towers, or other structures. Other literature was selected for its discussion of avian species affected by electrocution. Non-English-language reports are included when an English summary was available.

This bibliography's format, modeled after Avery *et al.* (1978, 1980), is designed to be as efficient and as user-friendly as possible. Citations are ordered by subject matter, kinds of birds, locations, and authors; subject categories are broad and include the type of structures involved and the major topics discussed in the articles. The types of birds (taxonomic) are ordered according to family (*e.g.*, warblers) or group (*e.g.*, shorebirds). United States incidents are ordered by state within U.S. Fish and Wildlife Service regional boundaries, and incidents outside the United States are ordered under Africa, Asia, Australia and New Zealand, Canada, Europe, Pacific Isles, and South America and the West Indies.

Return to Table of Contents.

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## ALPHABETICAL LISTING BY AUTHOR

1. Able, K.P. 1966. Television tower mortality near Louisville. *Kentucky Warbler* 42(2):27-28.

Five kills totaling 25 birds of 16 species occurred at a 973-foot tower in Kentucky during fall 1965 in association with low pressure systems and frontal activity.

2. \*Able, K.P. 1973. The changing seasons. *American Birds* 27(1):19-23.

In fall 1972, single night kills exceeding 1,000 birds occurred at TV towers in Tennessee and Florida, and two events occurred at the floodlit chimneys of the Lanais, Ontario, Canada, power plant.

3. Airola, D. 1987. Bird abundance and movements at the Potrero Hills wind turbine site, Solano County, California. Prepared for the Solano County Department of Environmental Management, Fairfield, California. Prepared by Jones and Stokes Associates, Sacramento, California. 43 pp.

"The proposed wind turbine site at the Potrero Hills, Solano County [California], was studied to determine use of the area by waterfowl, other waterbirds, raptors, and songbirds, and to assess potential for project-related impacts." Primary flight altitudes for the various bird groups were estimated through observations. Birds, especially raptors, songbirds, and gulls, often flew below the 30 m height of the proposed turbines, and collisions were determined likely for some species. The



*The Complete Bibliography  
is in the  
Administrative Record*

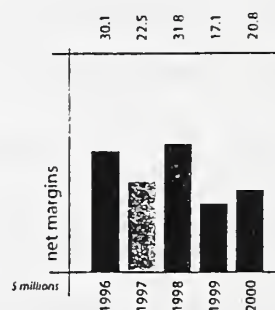
FOOTNOTE (2)

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power supply grid and below average federal hydroelectric energy production, contributed to electricity shortfalls in 2000. ■ Tri-State will add approximately 280 megawatts to the region's new generation resource pool with its four natural gas-fired combustion turbines that were purchased in 2000. The units will be installed over the next 12 months in Colorado — two in the Limon area and two near Brighton. Generation from three of these four turbines will be sold to Xcel Energy (formerly Public Service Co. of Colorado) under a 10-year contract. The fourth unit's capacity will provide electricity for Tri-State's member co-op growth. In addition, the association has plans to install similar units (totaling 150 megawatts) in southern New Mexico. ■ Along with maintaining over 5,300 miles of transmission line, the association's line crews worked on numerous transmission construction projects throughout its four-state service territory. Tri-State personnel completed substation work in the member service territories north of Denver, Colo., west of Raton, N.M., near Delta/Montrose, Colo., and in Ruidoso, N.M. Additional 230/115-kV transformers were installed at Burlington, Lamar and North Fork substations in Colorado to increase system reliability during periods of high usage and unforeseen system outages. ■ Another noteworthy project for the G&T's transmission line maintenance crews in 2000 was relocating three miles of the Hayden-Axial 138-kV transmission line at Trapper Mine to allow for expansion of the coal mining operation serving the association's Craig Station. Construction continued on the South Canal-Dallas Creek transmission line and substation south of Montrose, Colo. Three of Tri-State's major transmission projects are still in the preconstruction or permitting phases: the 230-kilovolt Colorado-New Mexico Intertie from Walsenburg, Colo., to Gladstone, N.M.; the I-25 Corridor 115-kV Loop project near Dacono, Colo.; and the Nucla to Telluride, Colo., 115-kV line project. ■ During this past summer's

extended period of hot, dry weather and soaring electrical demand, Tri-State set new record peak: while its loads exceeded budgeted projections. With the addition of the New Mexico service area on July 1, the G&T's member system peak topped out at a record 1,808 megawatts on August 14. ■ The association's generation and transmission network successfully met its escalating load requirements this year. However, during periods of peak electrical demand, the G&T frequently had to purchase power sold at premium prices on the wholesale market. During the heavier demand months in summer and winter, Tri-State's system



# Coal plant plan comes with pollution cost

By Michael Booth. 4/23/01  
Denver Post Staff Writer

It's a project that would build a \$1.3 billion complex in a stagnant part of the state, that would also pump millions of pounds of sulfur dioxide into clouds, contributing to acid rain.

It's a coal-fired behemoth at a time when the world is moving toward cleaner fuels, that at the same time would be an insurance policy for Colorado's strained power grid.

It would be the first coal-powered electrical plant built in Colorado for 20 years and might pollute Eastern Plains skies in order to export enough power to keep California from reverting to the Dark Ages.

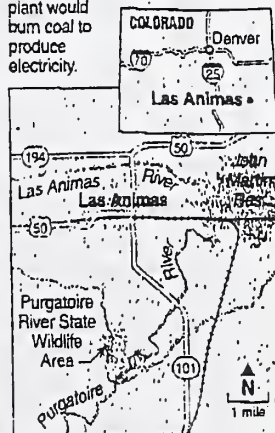
The 1,200-megawatt proposal for a power plant south of Las Animas, more than twice as big as any other power plant planned for Colorado, could write the future for Bent County and the state's second-largest utility, Tri-State Transmission & Generation, even while it becomes a magnet for debate over the Western power grid.

Environmental critics of coal say they probably can't stop the plant from opening by 2007, but global warming and the heated debate over Western power give them a better forum to object than when the last generation of coal plants came online.

"The real argument to stopping a plant like that is that there are cleaner and cheaper ways to provide electricity in the region," said John Nielsen, co-director of energy issues at the Land and Water Fund in Boulder. Nielsen pointed out the irony of the new coal plant being proposed for a site just 30 miles west of a 120-megawatt, pollution-

## Power on the plains

Tri-State Transmission & Generation wants to build a 1,200-megawatt power plant south of Las Animas. The plant would burn coal to produce electricity.



The Denver Post

free wind power project to be finished by Enron later this year.

"You can make the region a center for clean power, or the center for a new, large coal plant," Nielsen said. "Both will bring jobs. One will bring environmental impacts and one won't."

Tri-State says the time is right for a new coal plant because natural gas has become an expensive and volatile way to make electricity, while new technology has cleaned up coal. At mid-April prices for natural gas, the fuel alone for gas-generated electricity costs 5 cents a kilowatt hour, Tri-State claims, while coal costs 1.5

Please see COAL on 6A



# Coal plant has a cost

COAL from Page 1A

cents: Coal plants are more expensive, but the electricity they generate still ends up far cheaper.

The Westminster-based company, which sells power to city-owned utilities and rural electric cooperatives in four states, will go ahead with the Las Animas plant if it lands the state permits and can sell shares of the power to Xcel and other utilities.

"We'd incorporate the most stringent environmental controls that exist. If you're burning high-quality coal like either of our sources would provide and using all the best available technology, you're removing nearly everything before it hits the stacks," said Tri-State spokesman Jim VanSomeren. Tri-State will have a friendly reception when it seeks permits from Colorado. Gov. Bill Owens has pledged to support coal and other plants to keep the state from sliding into California's current electricity shortage. State health department permit officials say there's not much to stop coal if Tri-State agrees to use the "best available" pollution filters.

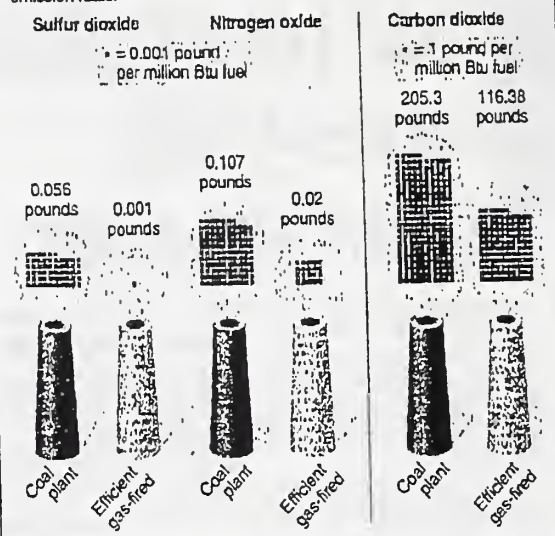
And while environmentalists warn that on hot, stagnant summer days, the Las Animas plant would be running full throttle and dropping pollution onto Bent County, southeastern Colorado community leaders are hungry for the plant and its big price tag.

"I don't think the rest of the whole county is worth that," said Kim McDonnell of the Bent County Development Foundation. Her group is working with Tri-State and local officials to ensure that all the land, water, rail and other building blocks are ready. They are also meeting to see what kind of local tax breaks they can offer, from property tax breaks to tax-free bonds for pollution-control measures, to make Tri-State's road even smoother.

Various sources estimate up to 1,000 workers would build the generating plant, with up to 350 permanent jobs at the plant after completion. The biggest current employer in Bent County, the Fort Lyon VA hospital that is converting to a prison, has 175 employees.

## Burning coal vs. gas

Burning coal to make electricity is cleaner than it used to be but still generates more pollution than burning natural gas. Here are some of the emission rates:



Source: U.S. Energy Information Administration

The Denver Post / Thomas McKay

There would be an impact, even just in terms of those people buying latches," McDonnell said.

While Tri-State faces an easier test than a California utility pitching the same idea, the Las Animas plant still must meet a number of challenges, overcoming the doubts of distance financiers as well as local watchdogs of the power grid.

Tri-State may see opposition build if it appears that its big new plant will be polluting Colorado skies to send power to California.

Tri-State general manager Frank Knutson acknowledged that when the plant comes online, there may be a window of a few years when Colorado wouldn't need all the electricity and the company would seek buyers elsewhere to recoup its costs. But the economics and planning of the Las Animas site will be based on Colorado demand, he said.

That window worries plant opponents, who say a similarly hopeful look to the West for a surge in power demand is what bankrupted the Colorado-Ute transmission company in the 1980s. That co-operative was taken over by Tri-State because it borrowed too much to build the Craig coal-fired plant and exaggerated the demand for power in the late 1980s.

"That's the strategy of every power generator in the country right now. Once again, California is exporting its pollution," said Rick Gilliam of the Land and Water Fund. "You have this boom-and-bust cycle in the energy business."

Tri-State will need to rake together \$1.2 billion from partners to build the plant, which they claim

will still generate electricity for less than natural gas, despite the heavy requirements for pollution-control equipment.

Xcel Energy, Colorado's major for-profit power company, owns the land and water rights near Las Animas where Tri-State wants to build. Tri-State is a partner with Xcel and others at the Craig coal-fired plant, but there's no guarantee that other utilities will want to buy into a new plant. Xcel said it hadn't heard a formal proposal from Tri-State and wouldn't comment.

As Gov. Owens put it recently, if you want to see a lot of angry citizens in one room, then propose building a big power line near their land. On top of the \$1.2 billion for the plant, Tri-State will have to spend at least \$100 million on new high-voltage lines to build a more efficient transmission loop up and down the Front Range.

"Nobody wants a transmission line, nobody wants a power plant, but we're getting very positive response from people in that part of the state," said Knutson.

Tri-State will have to prove the Las Animas plant won't top acceptable levels of nitrogen oxide, sulfur dioxide, particulates and other pollutants, though that will be easier in the relatively untouched southeastern region than if it were proposed for metro Denver.

Tri-State says it can scrub 97 percent of the sulfur dioxide that can contribute to acid rain and that contributed to major fines and lawsuits at plants in Craig and Hayden. Environmentalists say that's not enough — they should also be

basics gas emitted by any form of burned fuel, which contributes to global warming.

If scientists further prove that fossil fuels cause climate change, governments may require expensive controls on coal plants, Nielsen said. "This is a huge (carbon dioxide) emitter. If there is pressure on the climate, I think there's a real economic problem with a plant like this," he said.

Tri-State's response will not appease environmental advocates.

"As far as global climate change goes, we agree with George W. Bush's position on that," said Knutson, who along with other power company executives is part of a coalition that labels global-warming claims sloppy science.

Michael Booth can be reached at mbooth@denverpost.com or 303-820-1686.



Footnote (4)

15

capacity can force existing capacity out of operation and remove the opportunity to recover even fixed operating costs. Displacement is not nearly so great in markets where low-cost coal generation still provides most of the energy needs.

An important element of the demand for generating capacity is the reserve margin: the generating capability over and above the peak demand used to fill in for generators temporarily out of service or unanticipated increase in peak demand due to abnormal weather. Historically, reserve margins are administratively set between 13 and 20 percent, based on studies that show such levels were required to supply a given, very high, level of service reliability.

Because the cost of supplying these reserves may be in the range of \$40 to \$60 per kilowatt (kW) year, customers may be willing to shed load and provide "instantaneous reserves" for others if paid to do so. This scenario creates a win/win proposition provided some customers are willing to shed load for a price less than the cost of reserves. What this suggests is an economical reserve margin that weighs the reliability requirements and electric price requirements of all customers in the region.

In power market simulations, an optimal reserve margin is estimated by modeling the megawatts and durations that customers are willing to reduce or "interrupt" for varying prices. The optimal reserve margin is reflected by the level of generating capacity that minimizes the market price of electricity by trading off the cost of reserves with the cost of interruptible loads.

#### What are the new generation building blocks?

While the existence of competing generators with low operating costs—such as nuclear and large coal fueled generators—can dampen future market prices for electricity, ultimately the market must pay the cost of investment in

new plants or supply will fail to meet growing demand.

As a consequence, the cost of new entrants in the market or new power plant "building blocks" become an important determinant of the future electric market prices and revenues for new power projects. It is not surprising, therefore, that institutions looking to finance power projects are curious about the future trends in the capital and operating costs of the new building blocks.

The key characteristics of the new building blocks appear to include both configuration and turbine characteristics. With regard to the current configuration of the "building block" plants, the combined cycle building block consists of two or three F Class combustion turbines with heat recovery steam generators providing steam to a single steam turbine. Inlet cooling and duct firing are common methods of boosting output when market prices or reliability warrants. The net full-load efficiency of this configuration is about 6,800 Btu/kWh, and the engineer procure and construct (EPC) capital cost for a 2004 start-up ranges from \$380 to \$480 per kW, depending on site-specific conditions and environmental constraints.

The rationale for selecting this con-

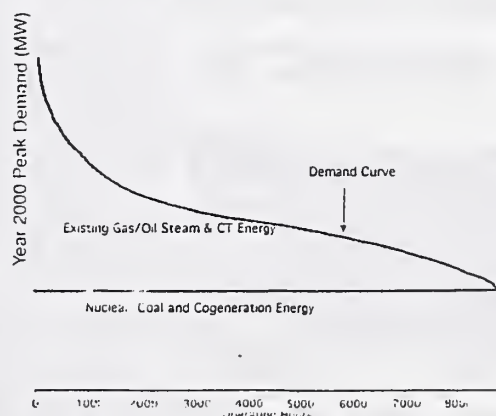
figuration is clearly economies-of-scale. The use of multiple turbines in the 170 to 185 MW size range offers capital cost savings of 20 to 25 percent over a single combustion turbine and steam turbine. Additional savings of 10 to 30 percent results from the use of 170 to 185 MW combustion turbines instead of the smaller 40-85 MW turbines.

These two capital cost efficiencies go a long way in explaining the popularity of the 500 to 800 MW combined cycle "building block." In some cases, two 500 MW combined cycle configurations (two combustion turbines with one steam turbine) are placed on one site. These sites are generally at locations that afford the owner excellent access to market via the transmission system.

The first G- and H-Class turbines to be commercial in 2000 through 2002 are larger and offer slightly greater capital cost and fuel savings over the F-Class turbines. This makes the G- and H-Class turbines very interesting to the large developers, who are planning the next base to intermediate "building block".

Identification of the simple cycle "building block" is a little more complex, partly because generating companies are looking to their new simple

FIGURE 2A Energy Balance Before Excess Capacity Additions



13

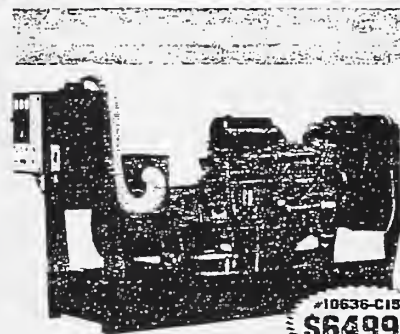


FOOTNOTE (5)



## Generators

Diesel Generators &amp; Transfer Switches

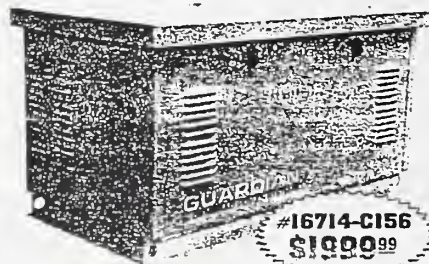
Service Protection Plus Available on  
NORTHERN PRO Generators!#10636-C156  
\$6499.99

## 20 HP, 17 KW DIESEL Auto-Starting Generator

- 26.4 gallon tank allows 12 hours of non-stop operation at 100% load
  - Engine also easily connects to a large diesel fuel storage tank
  - About 5 seconds after your local utility power falls, a transfer switch automatically starts the generator and transfers loads
- Built by world-renowned Daewoo. Low-maintenance DC 24 vertical in-line 2.367 litre, 1800 RPM diesel engine runs smoothly, efficiently and at low cost. Built for single phase use, generator produces 17,000 Watts of surge power and 15,000 Watts of continuous power. 141 Amps of 120V power and 70.8 Amps of 240V power. Engine shuts down automatically under low oil pressure, high water temp or engine overspeed condition. Design allows easy access for routine maintenance. Windings are 100% copper. A radiator-driven fan cools the engine. Industrial silencer reduces engine noise. Built-in charger 12V battery, 100 amp-hours. Measures 85" L x 29" W x 44" H fits through a 3 1/2 inch wide doorway. One year limited warranty. Ships by truck only.

Ship Wt. 1870 lbs.  
Item# 10636-C156 ..... Discount Price \$6499.99Auto Transfer Switches Available for  
10102-C156, 10109-C156, 101022-C156  
#1010783-C156

GENERAC

#16714-C156  
\$1999.99

## Diesel Generators

- New and exclusive "Kleen Power" design
  - Liquid-cooled engines (25, 25, and 50 HP are Mitsubishi; others are Perkins)
  - Open generator requires protection from weather, control panel sits atop it
  - Housed generator is weatherproof and rust free with minimum noise levels, control panel is behind hinged door
- Designed to be controlled air-gen-set or remotely, up to 75 feet away. Auto shutdowns include low oil temp & overspeed, etc. start/stop. Meters & gauges include voltmeter, ammeter, frequency run time, oil pressure, temperature and battery charging. Heavy duty air cleaner, residential muffler, spin on oil filter and fuel filter furnished on each gen-set. Options sold separately, including Remote Start/Stop Switch (#161482) and Manual and Automatic Transfer Switches. 3-phase units also available.

## OPEN GENERATORS

Item#	Engine	Max. power	Rated Amps 120V 240V	Fuel use	Dimensions	Model#	Ship Wt.	Discount Price
161472-C156	23 HP	18,000W	136 68	1.8 gal/hr	62"L x 34"W x 44"H	SCOD-180	980 lbs	\$7349.99
161473-C156	37 HP	25,000W	190 95	2.4 gal/hr	62"L x 34"W x 44"H	SCOD-250	1010 lbs	\$7799.99
161474-C156	73 HP	38,000W	292 146	2.8 gal/hr	62"L x 34"W x 44"H	SCOD-380	1767 lbs	\$8199.99
161475-C156	73 HP	46,000W	350 175	3.8 gal/hr	62"L x 34"W x 44"H	SCOD-460	1767 lbs	\$9099.99
161476-C156	95 HP	60,000W	458 229	4.2 gal/hr	75"L x 36"W x 48"H	SCOD-600	1992 lbs	\$10,099.99
161477-C156	116 HP	75,000W	566 283	4.7 gal/hr	75"L x 36"W x 48"H	SCOD-750	2069 lbs	\$11,229.99
161478-C156	165 HP	100,000W	750 375	5.2 gal/hr	75"L x 36"W x 48"H	SCOD-1000	2469 lbs	\$13,199.99
161479-C156	216 HP	125,000W	938 469	6.0 gal/hr	75"L x 36"W x 48"H	SCOD-1250	3115 lbs	\$17,459.99

## HOUSED GENERATORS

1614723-C156	23 HP	18,000W	136 68	1.8 gal/hr	62"L x 34"W x 44"H	SCD-180	1050 lbs	\$6549.99
1614733-C156	37 HP	25,000W	190 95	2.4 gal/hr	62"L x 34"W x 44"H	SCD-250	1060 lbs	\$8999.99
1614743-C156	73 HP	38,000W	292 146	2.8 gal/hr	62"L x 34"W x 44"H	SCD-380	2067 lbs	\$9599.99
1614753-C156	73 HP	46,000W	350 175	3.8 gal/hr	62"L x 34"W x 44"H	SCD-460	2067 lbs	\$10,229.99
1614763-C156	95 HP	60,000W	458 229	4.2 gal/hr	75"L x 36"W x 48"H	SCD-600	2217 lbs	\$11,299.99
1614773-C156	116 HP	75,000W	566 283	4.7 gal/hr	75"L x 36"W x 48"H	SCD-750	2344 lbs	\$12,429.99
1614783-C156	165 HP	100,000W	750 375	5.2 gal/hr	75"L x 36"W x 48"H	SCD-1000	2844 lbs	\$14,399.99
1614793-C156	216 HP	125,000W	938 469	6.0 gal/hr	75"L x 36"W x 48"H	SCD-1250	3115 lbs	\$17,459.99

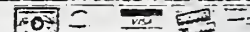
## Generac Standby Generators

- Powerful, air-cooled OHVI engine
  - Fueled by natural or LP gas
- Remote-mounted automatic transfer switch for fast and efficient unattended transfer to generator when utility current falls. Feature automatic low oil, high temperature and overspeed shutdowns. Standard 2-pole, 100 Amp UL-listed switch. Built-in charger keeps battery at optimum level. Protective enclosure shields generator from weather and reduces exterior noise levels. Includes key locks for security. Automatic 14-day exerciser runs the system for 7 minutes biweekly to maintain top running condition.

Item#	Power	Amps @ 120/240V	Cylinder	Ship Wt.	Discount Price
16714-C156	6 KW	50/25	Single	327 lbs	\$1999.99
16715-C156	8 KW	66.6/33.3	Twin	357 lbs	\$2499.99
16716-C156	10 KW	83.3/41.6	Twin	373 lbs	\$2999.99

300

Order Toll Free • 24 Hours, 7 Days a Week



## 15. Letter from Sheep Mountain Alliance

- 15A. The purpose and need for the project is set forth in the FEIS Chapter 1.0, Section 1.4. The purposes and needs for the project are multiple, and include both improving the power reliability in the local Telluride region and increasing regional load serving capacity in southwestern Colorado. The project will also allow Tri-State to fulfill bulk power transfer contracts currently in place with Western Area Power Administration. EIS Volume II, *Plate P&N-1* shows the regional transmission grid in Southwestern Colorado, and the 'loop service' that the proposed project will create. This clarification is included in the text of the FEIS. (See Chapter 1.0, Section 1.4.3.)

Alternatives to the proposed project were screened for consideration based on both the local and regional purposes and needs set forth by Tri-State. (See *General Response 9*.) Alternatives, such as the DG Alternatives, that would partially meet the purpose and need have been considered in detail, along with alternative routes that could fully meet the project's purpose and needs. Alternatives, such as energy conservation, that would not satisfy the primary goals of increased power reliability to the Telluride Area were considered and eliminated from detailed study in the EIS.

Costs reported in the EIS are general estimates to disclose comparative cost ranges for the transmission lines and DG Alternatives. The cost estimates take into account the major construction and operation cost parameters for each technology. General cost estimates are sufficient for comparison of reasonable alternatives, and determination of final exact cost figures is unnecessary. The exact final figures are unlikely to materially alter the comparison of alternatives that is presented in the general cost data. Actual costs would be expected to vary somewhat depending upon site-specific conditions, including the value of properties affected, mitigation measures required (e.g. landscaping or architectural treatments), etc. Final costs will not be determined until final engineering and the establishment and acquisition of the project right-of-way.

- 15B. The following responses are provided according to the alternatives described in this comment. All alternatives raised during scoping and in comments on the Draft EIS have been considered. The approach to screening alternatives is described in *General Responses 9 and 10*.

The No Action Alternative is evaluated equally to the other action alternatives in accordance with NEPA (40 C.F.R.1502.14 (c)). Effects of the No Action Alternative are disclosed in FEIS Sections 3.2.2.7, 3.3.2.7, 3.4.2.7, 3.5.2.7, 3.6.2.8, 3.7.2.7, 3.8.2.7, 3.9.2.7, 3.10.2.7, 3.11.2.8, 3.12.2.7, 3.13.2.7 of the FEIS.

With respect to reinforcing the Ophir Pass 115 kV line, Tri-State has made a number of changes to improve the reliability of this line (i.e. the Telluride-Hesperus line), which was upgraded from 69 kV to 115 kV in 1998. Recent improvements include improving electrical clearances, and increasing structure maintenance. Constructing access roads to all portions of the line would further improve the reliability of the Telluride-Hesperus line by decreasing Tri-State's response and power restoration time requirements. However, this type of maintenance plan would substantially increase environmental impacts by increasing access and ground disturbances into sensitive areas of the national forest. Furthermore, the reliability of the line will always be at risk since the Hesperus-Telluride 115 kV transmission line traverses Ophir, Molas, and Coal Bank mountain passes, and is inherently subject to risks associated with major winter storms, lightning, and forest fires.



The NERC/WSCC establishes the industry-wide Reliability Standards for utilities in the Western States. NERC/WSCC Reliability Standards encompass the following two components:

*Adequacy – The ability of the electric systems to supply the aggregate electrical demand and energy requirements of their customers at all times, taking into account scheduled and reasonably expected unscheduled outages of system elements.*

*Security – The ability of the electric systems to withstand sudden disturbances such as electric short circuits or unanticipated loss of system elements.*

Based on the application of the NERC/WSCC Standards, the Hesperus-Telluride transmission line is not capable of providing an adequate and secure source of power to the Telluride area. The addition of the Nucla-Telluride (Sunshine) 115 kV line becomes the element that adds adequacy and security to the Telluride area loads and capability of the transmission system to serve additional load throughout Southwestern Colorado.

The FEIS evaluates rebuilding the Nucla-Telluride line at 44 kV or higher voltage (e.g. 69 kV) in Section 2.3.2.

The FEIS evaluates the environmental effects of undergrounding the 115 kV line across sensitive and scenic areas of San Miguel County, including portions of Beaver, Specie, Wilson and Sunshine mesas in FEIS Sections 3.3.2.3, 3.4.2.3, 3.5.2.3, 3.6.2.4, 3.7.2.3, 3.8.2.3, 3.9.2.3, 3.10.2.3, 3.11.2.4, 3.12.2.3, 3.13.2.3

Local single source generation, local consumer scale generation, efficiency legislation, and peak limiting incentives were not examined in detail since they would not adequately improve the power reliability in the Telluride Area and/or provide for increased load serving capacity in Southwestern Colorado. Conservation measures and incentives are encouraged at the local planning and regulatory levels of government (see General Response 10).

The pros and cons of undergrounding the 115 kV line are set forth in the EIS Chapter 3.0 and in the Summary. For purposes of clarification, the following additional responses are provided. Bird strike mortality, route tree cutting, and direct and indirect impacts from access road improvements are addressed in the EIS, Vol. I, Section 2.2.1 and/or Section 3.6 of the EIS. Viewshed impacts are described in Vol. I, Section 3.10.

The overhead 115 kV transmission line would not result in significantly higher annual maintenance costs. Although unlikely to occur, the overhead line would be more susceptible to catastrophic events, lightning strikes and aircraft hazards than an underground facility. It is important to note, however, that the project static line will significantly mitigate potential hazards associated with lightning strikes.

Aircraft hazards are considered minimal since the transmission line is not located within proximity to the Telluride Airport. Some aircraft hazards would exist at the canyon crossings, and colored marker balls would be installed on the static line to reduce these hazards to less than significant levels. Both the overhead and underground alternatives would require overhead crossings at these canyons and therefore would have the same risks.

Finally, arsenic leaching from treated wood poles is not considered a significant issue. Poles are typically treated with phenachlorophenol or new creosote in accordance with RUS approved treatments. As an alternative, chromated copper arsenate (CCA) could be used in visually sensitive areas to reduce pole contrasts in aspen



settings. Leaching from poles typically is limited to about a radius of one foot. Poles would be located at least 25 feet from natural drainages and waterways.

- 15C. Due to the 50+ year age of the existing 44/69 kV line, the on-going deterioration of the poles, and the lack of an overhead shield wire to protect against lightning strikes, it is reasonable to predict that the reliability of this facility will decline with increasing age. To date, SMPA has been able to perform the necessary routine and emergency maintenance on this facility. As discussed in the FEIS, Section 1.3.2, Tri-State's and SMPA's ability to perform routine and/or emergency maintenance on the existing Nucla-Sunshine 69 kV line and the Hesperus-Telluride 115 kV line is diminishing and soon will not be possible due to load growth in the Telluride Area that will make it impossible to deenergize these lines for maintenance purposes. See response to 15B regarding NERC/WSCC reliability standards that are applicable to Tri-State's proposed project.
- 15D. An underground transmission line would eliminate the potential for bird strike mortality. Maintenance requirements for an underground transmission line are discussed in EIS Section 2.2.1. Viewshed impacts would be reduced significantly, although it must be recognized that an underground line would require a continuous trench for installation, and revegetation may take a number of years depending upon the vegetation type to be reestablished, as well as soil and water conditions. It should also be noted that underground lines would cause substantially greater ground disturbances compared to overhead facilities and avoidance of sensitive areas would be more difficult.
- 15E. New power generation is not part of this project and is not within the scope of this EIS (See *General Response 1* regarding CEQ guidelines for NEPA and 'connected actions'). The need for, and costs of, a compressor station, and the costs of natural gas fuel for the DG Alternatives were specifically considered for the project area, and determined by AESC through consultations with KN Energy (AESC, 2000).
- 15F. See response to Comment 15B above.
- 15G. See response to Comment 15C above and *General Response 10*. Although energy conservation could delay when this project is warranted, the overall need for this project is to provide backup reliability to the Hesperus-Telluride Line, not to provide the primary source of power for new growth.
- 15H. See response to Comment 15B and 15G above.
- 15I. See response to Comment 15B and 15G above.
- 15J. The cost of the project will be distributed among Tri-State's 44 members that supply power to an estimated 950,000 persons in Wyoming, Colorado, New Mexico and Nebraska. Consequently, the project costs will be significantly lower to SMPA's ratepayers than alternatives suggested in this comment letter. In comparison, costs associated with natural gas conversions or lower line voltages would need to be absorbed by either individual homeowners (e.g. taxation or permitting to shift customers to natural gas) or SMPA's 10,000+ ratepayers (e.g. rebuilding the existing 44 kV line to a lower voltage for local reliability only).
- 15K. See response 15A and FEIS Sections 1.4.2 and 1.4.3 regarding loop service. The 55 MW capacity of the proposed 115 kV line would be sufficient to provide adequate backup reliability to the Telluride region, where future demand is estimated by SMPA to reach 30 MW by 2015. The proposed 115 kV transmission line would also

have adequate capacity to meet the increasing load serving needs of the region and fulfill Tri-State's contracts for bulk power transfers.

- 15L. A number of states, including Colorado, are in the process of evaluating the possible effects of deregulating their electric utilities, similar to California. Consideration of this possibility in the FEIS as an alternative to the project is speculative and beyond the scope of the FEIS.
- 15M. Consideration of existing utility corridors is typically done in the early scoping of proposed transmission line projects. There has been no indication from the public, utilities, or private energy companies that additional transmission lines are contemplated for this area. In the absence of a specific proposal, cumulative effects of multiple lines would be speculative and beyond the scope of this FEIS.
- 15N. Rights-of-way for the proposed transmission line would be acquired by Tri-State for the life of the project or until the line is dismantled.
- 15O. Attachments and footnotes are incorporated into the Administrative Record. No responses are necessary.

**POSTED**

District Ranger  
Norwood Ranger District  
P. O. Box 388  
Norwood, CO 81423

Date: May 17, 2001

NORWOOD DISTRICT	
MAY 22 2001	
DISTRICT RANGER	✓
TCE	
VEG. MGMT.	
REC. STAFF	
WILDLIFE	
LANDS. MGMT. STAFF	✓
SIG AD TECH	
BUS. MGMT. STAFF	
PROMISE CARD	
FILE	

16

Re: Draft Environmental Impact Statement (DEIS) for Nucla-Telluride Transmission Line Project

We are in disagreement with several facts presented in the DEIS and would like the Forest Service to re-evaluate their findings in several important areas. Please consider these responses and incorporate the necessary changes into the Final Environmental Impact Statement.

#### Responses to Findings

##### 1. Table 3.8-5 Summary of Land Use Impacts {page 3.8-19}

- a. The definition of High Impact {page 3.8-16} should include the effect on the wilderness setting of Naturita Canyon "... land use activities ... that are unique... or natural in the region ...."
- b. In Table 3.8-5, this would require a new category under Existing Land Uses of "Impacts to Naturita Canyon", with a high impact rating for the Nucla-Norwood Southern Alternative.
- c. Land Use Issues/Impacts category "Number of Homes within 0.5 miles of Alignment" does not accurately reflect the adverse impact of the dramatic crossing over Naturita Canyon. Because of the high visibility, this will strongly affect homes over 2 miles away. The impact rating should state a **High Impact**.

16A

##### 2. Recreation Opportunity Spectrum (ROS) {page 3.9-8}

- a. The portion of Naturita Canyon being crossed by the Nucla-Norwood Southern Alternative is certainly designated as (P) Primitive according to Table 3.9-1 {page 3.9-2}, as it meets every one of the criteria.
- b. The applicable ROS classifications would change with the Project, and a strong negative impact to ROS goals would be identified.

16B



3. Recreational Resources and Activities {page 3.9-8}

- a. Because the ROS should be designated (P) Primitive for Naturita Canyon at the Nucla-Norwood Southern Alternative, the short-term impact would be **High** ("... prevented or impeded for more than one day ..."). Also, the long-term impact would be **High**, as the (P) Primitive ROS would be permanently disrupted.

16C

4. Visual Resource Management (VRM) system {page 3.10-6}

- a. The BLM Resource Management Plan was compiled in 1984, and does not accurately designate the portion of Naturita Canyon for the Nucla-Norwood Southern Alternative. It should be **Class I**, "where the objective is to preserve the existing landscape. Any change to the character should be very low and not attract attention".

16D

5. Table 3.10-2 Summary of Visual Impacts

- a. Visual Resource/Issue "Naturita Canyon - Dispersed Recreation Area" should certainly be designated **High Impact** for the Nucla-Norwood Southern Alternative according to 3 out of 5 criteria for Definition of Impact Levels {page 3.10-10}.
- b. The Visual Resource/Issue "Viewers within MG distance zone" is over **18-High Impact** near Naturita Canyon alone. We can demonstrate this on maps.

16E

6. Sensitive Viewer Impacts {page 3.10-18}

- a. Recreationists in Naturita Canyon will be affected (says "may be affected" in report!).
- b. **High** visual impacts would occur to those residences with foreground distance views, according to 3 out of 5 criteria for Definition of Impact Levels {page 3.10-10}.
- c. More than **18 parcels** of land have views of Naturita Canyon. (only using homes is not a fair criteria, because many vacant parcels are planned to be built upon).
- d. Regarding the potential visual impacts to recreational users of Naturita Canyon, the line will be **noticeably** visible within the canyon for **several miles** of where the line and marker balls would pass overhead. (this is due to

16F

16

the spanning of the canyon from rim to rim, which is quite easily visible from miles away. Recreational users mostly value the wilderness setting which is virtually destroyed by the site of a transmission line overhead).

- e. While contrasts would be high, frequency and duration of view would make the impacts High in degree.

16F

7. Conformity of Plans and Policies {page 3.10-18}

- a. Because we believe that the VRM designation should be Class I, the degree of visual change brought about by the Project would be High.

16G

8. Definition of Socioeconomic Impact Levels {page 3.11-11}

- a. The definition of High Impacts states "Property values are impacted from transmission line location within 50 to 300 feet of property due to key scenic views being altered". We believe that due to the high visibility of the proposed Naturita Canyon crossing, key scenic views will be altered for landowners several miles away (Howard Shore property for example), which will have a tremendous impact on property values for these landowners. We have counted over 18 parcels that are situated along the canyon rim or in the bottom of the canyon itself. These landowners consider the scenic view of Naturita Canyon to be their most valuable asset. The definition of High Impact should simply be "Property values are significantly impacted due to key scenic values being altered".

16H

9. Social Concerns {page 3.11-12}

- a. The concerns cited should include scenic impacts to Naturita Canyon.
- b. The Petition submitted by our organization to the U.S. Forest Service should be mentioned.

16I

10. Table 3.11-11 Potential Impacts to Property Values {page 3.11-22}

- a. This table only represents properties within 1320 feet of the proposed transmission line, which does not accurately reflect the true impacts to Property Values as stated in 8.a. above.
- b. The properties Within Corridor (1320 feet) should have a High Impact level where they are at Naturita Canyon. These

16J

16

land values will be reduced significantly (see comments from local real estate representatives on page 3.11-17).

16J

11. 115 kV Transmission Line Effects {page 3.12-7}

a. Existing exploration seismic disturbances would be widened from about 4 feet to 12 feet. This is presented throughout the DEIS as a way to minimize disturbance to. In reality, these seismic lines are about 20 years old, largely overgrown and hardly noticeable. When these are widened to 12 feet, they will substantially impact the vegetation/forest communities on BLM lands.

16K

Thank you for considering our Responses.

Friends of Naturita Canyon



## 16. Letter from Friends of Naturita Canyon

(See General Response 16)

- 16A. The Land Use Section of the EIS assesses the potential physical and operational effects of the proposed project and alternatives on existing developed uses (e.g. homes, agricultural lands). This section also describes the adopted plans and policies of jurisdictional agencies and specific plans that have been approved or pending approval. Informal recreational activities are addressed in EIS Section 3.9. Visual impacts to residences and to areas with high scenic or natural values are addressed in Section 3.10. These types of impacts to Naturita Canyon are consequently disclosed in Sections 3.9 and 3.10, rather than 3.8.
- 16B. The purpose and use of the Recreation Opportunity Spectrum (ROS) system by the U.S. Forest Service and BLM is described in EIS Section 3.9.1. The EIS describes the ROS categories previously assigned by the BLM for the Travel Management Plan. It is beyond the scope of this EIS to reevaluate the ROS designations assigned for the Travel Management Plan. Rather, the purpose of the EIS evaluation of ROS categories is to determine whether the proposed project would constitute a conflict with the federal recreational resource planning goals and objectives.
- 16C. See comment response 16B. The assignment of impacts to Naturita Canyon are also dependent on whether the line would be routed down into the canyon (Subalternative A) or span the canyon rim to rim. Direct, physical impacts to the canyon would be avoided or minimized if the canyon is spanned.
- 16D. Similar to the ROS system, VRM categories have been assigned by the BLM to reflect the visual quality planning objectives for federal lands under their jurisdiction. VRM Class I is assigned to landscapes where the BLM's objective is to preserve the existing landscape, rather than allow any types of multiple uses that could alter the visual quality of the landscape. Typically, Class I is assigned to areas managed for preservation, such as wilderness areas, or wilderness study areas. The purpose of the EIS evaluation of VRM classes is to determine whether the proposed project and alternatives would be compatible or conflict with these established visual objectives. It is beyond the scope of the EIS to reevaluate the VRM classes assigned as part of federal resource planning activities.
- 16E. Moderate impacts are identified for the potential impacts to Naturita Canyon's informal recreational uses since the proposed transmission line would span the canyon rim to rim, rather than be routed down into the canyon floor. Potential impacts to the quality of recreational experiences within the confined canyon would be intermittent, and limited by vegetation on the canyon floor and the angle of view to the conductors above.

The FEIS has been modified to reflect the number of viewers within the middleground distance zone noted in this comment (i.e. 18 rather than 10).

- 16F. *Comment a.* is noted.

*Comment b.* Moderate impacts were assigned where the line would cross agricultural settings on Wrights Mesa where numerous developments already exist including overhead distribution lines. In these types of developed landscape settings, the increased height of the wood poles may draw attention within 0.5 mile, but would not create high contrasts in line, form, color or texture. These developed settings primarily occur at the eastern end of the alignment, west of the Norwood Substation

site. High impacts are assessed where the poles and line would be openly visible against the natural setting of Naturita Canyon. Contrasts in line, form and color would be high due to the contrasts of the project conductors and marker balls with the homogeneous natural background. Text changes are incorporated in the FEIS.

*Comment c:* See Comment 16E above.

*Comment d and e:* See response to Comment b above.

16G. See response to Comment 16D.

16H. Impacts to property values relate to the perceived factors that affect property values such as visual encumbrances and health and safety impacts. Impacts to property values are often subjective and in some instances a negative impact to one person can be seen as a positive impact by another person. For example, a property adjacent to a cleared right-of-way may provide open space and better views for one property owner (a perceived positive impact), while another property owner would feel negatively impacted by the proximity of the line. Appraisers have indicated that high-voltage transmission lines may affect some residential properties and not others; the effect being a function of the relative price of the property. There are schools of thought that suggest only lower priced properties are affected, other appraisers claim the opposite – it is higher priced properties that suffer (Delaney 1992). Therefore the use of 'potentially' moderate or high impacts is used to describe impacts to property values depending on the subjective nature of the impact. It should be noted that the EIS addresses the potential for property value impacts in Section 3.11.

The assessment of potential property value impacts was based on review of literature analyzing the effects of high-voltage transmission lines on property values. In several studies, findings suggested that net visual encumbrances (which affect property values) reached a maximum for houses located between 50 and 100 meters (165 to 325 feet) from the easement boundary. According to these studies, negative visual impacts tended to decrease rapidly with distance and are not significant beyond 500 feet (Des Rosiers, 1998). Another study suggested that transmission lines appear to have little impact on property values at distances beyond 200 feet, substantial differences in selling price were shown to exist between 50 and 200 feet (Colwell and Foley 1979). All literature reviewed on the effects of high-voltage transmission lines on property values are cited in the DEIS Socioeconomics References. The FEIS analysis of property value impacts has been modified to clarify that impacts to property values may range from high to low beyond 300 feet based on the unique characteristics of properties, scenic views and existing cultural influences. To reflect the wide variety of effects that may occur, property value impacts beyond the 300-foot distance have been assigned a moderate impact level. It is not within the scope of the EIS to provide a detailed assessment of individual property value impacts.

16I. Comment noted. Naturita Canyon has been included in the FEIS as an area of social concern.

16J. See response to 16H.

16K. Comment noted. The potential direct and indirect impacts of widening the seismic disturbances are described in the EIS, Section 3.6.2.3.



From: Dean Silver To: Steve Wells

Date: 5/30/01 Time: 2:44:20 PM

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**FALL CREEK CONSULTING**

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**PROTOD**

Dean Silver

970-728-6535

FAX 970-728-6626

dsilver@montrose.net

May 30, 2001

Mr. Steve Wells *sw*  
National Forest Service  
PO Box 388  
Norwood, CO 81423

Dear Sir:

I am writing to comment on the Draft EIS for the Nucla-Telluride Transmission Line Project. I have found one significant error and several incorrect statements in your analysis that require your attention, and reevaluation of your conclusions.

I support the upgrading of the line to 115kv. I feel that the need has been established, and that the replacement of the line is the most sensible and reasonable alternative. I commend you on the extensive analysis that you have produced. However, I feel that the conclusion you have reached is improper. My comments address only the Nucla-Norwood segment of the line.

You have determined that the Central alternative is your preferred alternative. I believe that the Southern alternative, including subalternative A, should be the preferred choice.

It is apparent that the cumulative environmental impacts, short and long term, of both the Central and Southern alternative are very similar when taken in sum. Likewise the costs of either of these alternatives is similar. There are only two significant differences between these two alternatives: the visual impacts, and the land use impacts. These impacts are permanent (for the life of the line). These impacts affect every person who lives, visits, or travels on Wright's Mesa.

In analyzing the visual impacts of the Central alternative, the DEIS states that "overall, impacts to the canyon are anticipated to be low". (all ref. From DEIS, vol. 1, p. 3.10-16) This is correct, and also applies to the Southern Alternative, except when the line crosses the canyon. The DEIS goes on to state that "the agricultural settings are typically open, pastoral, and of visual interest due to the natural beauty and ranching history. Beyond the foreground distance zone, transmission line poles would blend in scale with other visible cultural features, such as fences and distribution lines." The second statement is entirely incorrect. The new poles would be approximately double the height of any existing poles. The existing 69kv line is the only power line on the rim of the creek all of the way from the Redvale-Basin Road to 4050 Road. There are no buildings or trees, no natural or man-made features in that corridor that even approach a height of 70-80 feet. The distribution lines along the highway are generally 35-40 feet tall, and the conductors and insulators are of smaller diameter and size than those that will be required for the new line. The new line would be highly visible from the highway and devastating to the view to the south, entirely out of keeping with the "open, pastoral... natural beauty...". The contention that "transmission line poles would blend in scale with other visible cultural features..." is simply incorrect.

17A

17B



From: Dean Silver 10:06:00 AM

Date: 07/30/01 Time: 2:44:20 PM

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Comment regarding DEIS  
Dean Silver

Page 2  
May 30, 2001

17

The DEIS goes on to state that "sensitive viewers potentially affected by this alternative include residents and travelers along local roadways and the Unaweep-Tabeguache Scenic and Historic Byway". I do not know the number of travelers daily along this stretch of highway, but I am certain that it is several orders of magnitude higher than the number of people down in Naturita Canyon and up in the Burn at any time. Since "the project would be viewed at distances ranging from 0.4 to 0.6 mile away, for approximately 6.5 road miles", and since the contrast would be so pronounced, this impact should be described as SIGNIFICANT or HIGH. The statement that "moderate to low impacts would also be expected along these areas due to the viewing distance and the weak to moderate visual contrast... within this agricultural landscape" is simply incorrect.

The DEIS also states that "this alternative would pose similar conflicts with the (San Miguel) County's goals and objectives for Wrights Mesa". Also not mentioned is the obvious conflict with the purpose and nature of the Scenic and Historic Byway. The desires of the local residents must be considered and given weight. The local government's position on this issue is clear.

17C

The Southern alternative is a viable solution to these problems. It will push the project out of the foreground of the view corridor of the highway and up into the Burn. It will be much less visible to all of the residents, travelers, and visitors. It will blend as well with the landscape in the Burn as it would on the Rim, but it would be much less visible from the highway since it would be an average of two miles away as opposed to one half mile, with a much reduced apparent scale. As stated on p.3.10-18, the Southern alternative "would not conflict with San Miguel county's goals for Wright's Mesa, since the line would avoid most scenic related impacts to agricultural areas and to SH 145."

The objections to the Southern alternative focus on the crossing of the Canyon. I submit that the same objections must be made of the crossing further downstream of the Central alternative. The error in the DEIS is that the analysis ignores this crossing. Table 3.10-2 states that there is no Naturita Canyon crossing with the Central alternative. This is not correct. The Central alternative would cross Naturita Canyon approximately 1/2 mile southeast of the Redvale-Basin Road bridge. This error is not only in the table. The crossing is never mentioned in the narrative on page 3.10-15 and 16. It is also omitted in table 3.10-2. This essential feature of the Central alternative has been ignored or overlooked. The conceptualization and visualization of the Central alternative by the authors of the DEIS is fatally flawed. This misstatement negates any conclusions that are drawn considering the canyon crossing issue.

17D

The visual impacts of either of these crossings, and of the line from the canyon floor, are of much less significance than those of the visibility of the line itself all along its route. Many more homes are affected in the foreground by the Central alternative than are affected by the Southern alternative (Central: 102, Southern: 39). Many more people (travelers) are affected in the foreground by the Central alternative than are affected by the Southern alternative.

17E

Furthermore, the Central alternative will have a much greater impact on agricultural land than would the Southern alternative. That is a significant, permanent impact on the ranchers and farmers who will have to deal with those poles. The poles and the widening of the existing roads in the Burn will have no foreground impact upon anyone except the occasional visitor to those "badlands", which are virtually inaccessible for parts of the year due to mud. Table 3.8-5 makes it clear that in terms of land use impacts, the Southern alternative has equal or less adverse and high impacts than the Central alternative in all cases.

17F

From: Dean Silver To: Steve Wells

Date: 5/30/01 Time: 2:44:20 PM

Page 4 of 4

Comment regarding DEIS  
Dean Silver

Page 3  
May 30, 2001

17

To summarize, there exists the opportunity to set an alignment that will:

- 1- minimize visual impacts on the scenic byway and residents of Wright's Mesa
- 2- minimize adverse land use impacts on valuable agricultural land
- 3- conform to the goals of San Miguel county

The Southern alternative is the only route that will achieve these objectives. The Southern alternative had no significantly greater impacts of any kind than the Central alternative; thus it should be preferred because of the advantages noted above. The Central alternative is never preferable to the Southern alternative in terms of land use and visual impacts. These are impacts that will be permanent.

17G

The error in the DEIS, namely the omission of consideration of the Naturita Canyon crossing in the Central alternative, calls the analysis of the Nucla-Norwood alternatives into question, and certainly its conclusions. Perhaps this explains why the DEIS chooses the Central alternative, even though that route clearly has more negative impacts, and is inferior in most significant respects.

The DEIS has concluded correctly that this transmission line is necessary. Nobody wants to see it; nobody wants to be near it. The way to make it less visible and intrusive is to follow the Southern alternative. Route it through the Burn where it will be less visible from all of Wright's Mesa, and where far fewer people work and play. Then follow Subalternative A so the canyon crossing will not include marker balls, and will be visible from a much smaller area.

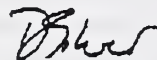
This project is ultimately about people, and their quality of life. Reliable electric power is an essential component of modern life. But it need not come at the cost of these other aspects of the quality of life on Wright's Mesa, visual and land use impacts. You must place the highest priority upon the greatest good for the greatest number of people, and likewise the fewest adverse affects for the greatest number of people.

17H

These goals can be achieved by choosing the Southern alternative. The Southern alternative is equal or superior to the Central alternative in all respects; therefore it is superior in total. It should be the preferred alternative.

I appreciate your consideration of my comments.

Sincerely,



Dean Silver

cc: Vern Ebert  
Art Goodtimes  
Elaine Fischer  
Jennifer Thurston  
Bob Beer  
Roger Culver  
Karen Metzger

**17. Letter from Fall Creek Consulting**

- 17A. Comment noted. In addition to visual and land use effects, there are notable differences between the Central and Southern Alternatives with respect to the amount of potential ground disturbances and associated direct and indirect impacts to biological and natural resources. Indirect impacts resulting from the general public's use of lands accessible by new access roads are associated with the Southern Alternative and would result from the proposed widening of seismic disturbances for access roads. These are discussed in EIS Section 3.6.2.3 and in the Summary.
- 17B. The scale of the proposed transmission line depends on the setting in which it is viewed and will generally diminish in scale with increasing viewing distance. Within the rural residential and agricultural settings of Wrights Mesa, the increased height of the poles would be noticeably visible and may be out-of-scale with other land use features within the foreground distance zone (0.5-mile). With increasing distance, however, the transmission poles would be perceived as in scale with other closer land use features including buildings and distribution lines. See attached photographs of similar poles in various settings and distances. Located along the northern rim of Naturita Canyon, the transmission line would be viewed against the background of Wrights Mesa agricultural landscapes from elevated sections of County Roads 1135 or AA.42 (McKee Draw) Road. From the canyon floor, visibility to the transmission poles on the canyon rim would be intermittent; and the taller poles may be the only cultural features seen, depending on viewer location. Other land uses along the northern canyon rim that may also be visible, however, include a gravel pit, salvage yard, and several dispersed residences. Due to the mixed uses along this northern canyon rim, the visual impacts of the proposed taller transmission line are assessed as moderate overall, but could range from high to low depending on specific viewing location, final design and right-of-way location. With respect to views from SR 145, the transmission line would be located approximately 0.5 mile away and viewed within the context of the Wrights Mesa agricultural landscape. Visual impacts to the highway views are assessed as moderate due to both the viewing distance and the agricultural landscape setting.
- 17C. Comment noted. The Southern Alternative would be less visible to travelers along the Unaweep-Tabeguache Scenic and Historic Byway and to residents on Wrights Mesa than the Central Alternative. However, the Southern Alternative would have greater visual impacts to residents along the canyon, as well as to persons engaged in informal recreational activities along the canyon floor. As noted above, the Southern Alternative would also result in greater ground disturbances for access roads, and increased indirect impacts resulting from access into previously remote areas. Indirect impacts from widened access roads would include the potential for noxious and exotic species, and impacts resulting from increased human activities (e.g. indirect effects to previously inaccessible cultural sites).
- 17D. The DEIS reports the crossing of Naturita Canyon in Section 2.2.1. Additional text changes have been incorporated in various sections of the FEIS, however, to clarify impacts associated with this crossing. With respect to the visual resources section, the crossing of Naturita Canyon has been added to *Table 3.10.2*. Information on this crossing was inadvertently omitted in the DEIS. In addition, the impact conclusions in *Table 3.10.2* have been expanded to reflect that the Central Alternative crossing of Naturita Canyon would be visible from 11.35 Road. Visual impacts are assessed as moderate to high at this crossing. The canyon crossing would primarily be visible



from 11.35 Road and from several residences (approximately 3) located east of the crossing along 35.75 Road. Conclusions regarding the comparative visual effects of the Southern and Central Alternatives remain unchanged, however. The Southern Alternative is considered more visually sensitive due to the undeveloped and primitive condition of this section of the canyon, and viewer attitudes towards visual impacts and local scenic values. Viewer concerns for scenic quality are higher along the Southern Alternative, as evidenced by both the scoping comments and DEIS comments. In comparison, little to no concern has been expressed by local residents for this section of the canyon that has previously been altered by a mining operation on the eastern edge of the northern rim crossing. Except for travelers along 11.35 Road, the section of Naturita Canyon that would be crossed by the Central Alternative is largely unseen.

- 17E. As disclosed in the EIS, Section 3.10, the Central Alternative would potentially be seen by more residents of Wrights Mesa than the Southern Alternative. However, the severity of these visual changes are assessed as moderate in degree and less than significant. Visual impacts have been evaluated for the project and alternatives using the BLM's VRM system and specifically the visual contrast methodology that measures changes in contrast according to line, form, color, and texture elements (BLM Manual Handbook 8431-1, 1986). The significance of visual changes to the landscape depends on a number of factors including viewer attitudes toward change (i.e. also called viewer sensitivity) and duration or frequency of views.
- 17F. Comment noted. The Central Alternative would have greater impacts on agricultural lands and operations than the Southern Alternative.
- 17G. It is true that the Southern Alternative would minimize visual impacts to the scenic byway and to more residents of Wrights Mesa, as compared to the Central Alternative. The EIS considers a range of natural, cultural and human environmental resources and conditions beyond those discussed in this comment, however, including both direct and indirect impacts from new access roads in currently remote locations of the county. See comment response 17C).
- 17H. See response to Comment 17D, E, F, and G. The Central Alternative was identified as the environmentally preferred alternative since it avoids most of the land use and visual impacts associated with the Northern Alternative and also avoids the natural resource impacts from increasing access into currently remote areas. Consequently, the Central Alternative provides the best balance among the tradeoffs of human, cultural and natural environmental concerns.

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*The perceived scale of transmission lines typically diminishes with distance.*



*At similar distances, landscaping can be a significant factor in scale perception.*





18

POSTED

NORWOOD GARDENS HOMEOWNERS ASSOCIATION  
P. O. BOX 641  
NORWOOD, CO 81423  
29 May 2001

Steve Wells  
U. S. Forest Service  
Norwood, CO 81423

NORWOOD DISTRICT			
MAY 30 2001			
	ADJ.	INFO.	INT.
CONTACT DETAILS			
VICE			
VEH. MGMT.			
VEH. STAFF			
WALDRIDGE			
LANDS MGMT. STAFF			
LAND AD/TECH			
VEH. MGMT. STAFF			
WALDRIDGE			
FILE			

Re: Proposed Nucla-Telluride Transmission Upgrade

Dear Steve,

The Norwood Gardens Homeowners Association (NGHA) and its individual lot owners will be negatively impacted, both economically and visually, by either of the preferred routes of the proposed transmission line on the existing right-of-way, as presented in the March 2001 Draft Environmental Impact Statement (EIS).

The paragraphs titled Land Use and Private Owner Conflicts on pages 11 and 12 of the Draft EIS Summary contain the statement, "Land use conflicts are considered long-term and adverse." The final EIS should fully describe and evaluate the adverse impact (including reduced property values) on the NGHA and other properties along the proposed upgraded transmission line.

Enclosed is a modified plat of the NGHA subdivision showing lots where property will be traversed and directly impacted by

- 1) Higher transmission lines, overhead
- 2) Higher transmission poles (60-97 feet, compared to present mid-30's feet)
- 3) Increased right-of-way (75-100 feet, compared to present 0 - 30 feet).

All NHGA lot owners will be visually impacted.

Your consideration of the above points is requested. Re-routing of the transmission line to the Southern Route remains our preference.

Sincerely,

Scott Godfrey, President

enc.

SG/ce

cc: San Miguel County Commissioners  
San Miguel Power Association

18A

NORWOOD GARDEN ESTATES

18



DIRECT IMPACT BY TRANSMISSION  
POLES AND LINES, RIGHTS-OF-WAY:

Lots 4, 5, 6, 9, 10, 11

VISUAL IMPACT BY VARYING DEGREE:

All Lots



**18. Letter from Scott Godfrey, President of the Norwood Gardens Homeowners Association.**

- 18A. The EIS evaluates the potential impacts to the Norwood Gardens Subdivision including the potential for long-term adverse visual impacts and impacts to property values. These impacts are incorporated into the overall findings for the Nucla-Norwood Northern and Central Alternatives in Sections 3.10 and 3.11 respectively, and are consistent with the issues set forth in this comment letter.

It is beyond the scope of the EIS to evaluate specific impacts to each individual property (see *General Response 14*). The EIS evaluates the range of effects that are likely to occur within each of the 0.5-mile wide corridors. The FEIS has been modified to reflect that visual effects may range from low to high on Wrights Mesa, depending on individual landowner viewing conditions. Private landowner issues will be considered by Montrose and San Miguel Counties in late 2001 during planning commission and county commissioners hearings to consider Tri-State's request for Special Use Permits.

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May 31, 2000

Steve Wells  
Project Manager  
Environmental Impact Statement  
Nucla-Telluride Transmission Line Project  
U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, Colorado 81423

NORWOOD DISTRICT	
JUN 04 2001	
	ACCT. INFO. INIT.
DISTRICT RANGER	
ICE	
REG. MGMT.	
REG. STAFF	
WILDLIFE	
CANES. MGMT. STAFF	
SKI AREA TECH	
SUS. MGMT. STAFF	
PUBLIC AFF. STAFF	
FILE	

**POSTED**  
PAG. MARKED  
5/31/01

Dear Mr. Wells:

This letter conveys comments on the Draft Environmental Impact Statement (DEIS) for the Nucla-Telluride Transmission Line Project. My sister, Carolyn Erickson of Norwood, asked that I prepare these comments because I have experience in the electricity business.

Carolyn is a widow who resides in a one bedroom house at 1973 Road W35 near Norwood. Her house and the surrounding property of about 15 acres are her primary assets. The Environmentally preferred alternative and the Agency Preferred alternative for the Nucla-Norwood portion of the project as described on S-18 of the DEIS would upgrade a 69 kV power line that currently traverses her property. The upgraded transmission line would have larger conductors that carry higher currents at higher voltage. If pole placements were similar to those of the current transmission line, the transmission poles and associated insulators and conductors would become much more visibly prominent than the current transmission line. I believe that the preferred alternative would substantially reduce the value of my sister's primary assets.

My intention in providing these comments is to make certain that this important public document fully and accurately reflects the impact of the project alternatives on the value of her property. The comments focus on three areas.

First, make the DEIS internally consistent.

Second, include all of the high impacts in the Visual Resources section.

Third, clarify impact characterizations within the Socioeconomics section and address the environmental justice consequences of choosing the Nucla-Norwood Central Alternative rather than the Nucla-Norwood Southern Alternative.

Consistency

Pole Heights

The DEIS inconsistently describes pole heights. The variations are so substantial that Visual Resources impacts might vary from High to Moderate or from Moderate to Low depending upon the pole height version chosen. For instance:

19A



19

- Figure 2.2-1, Representative Pole Designs, on page 2-7 shows pole heights of 81, 80 and 87 feet.
- Impacts Common to All Alternatives on page S-8 says, the average height of the poles will be 80 feet.
- Table A-1.2-1 shows H-frame structure heights of 61 to 88 feet, single pole structure heights of 65 to 97 feet and three-pole structure heights of 61 to 88 feet.

19A

One reason that the DEIS is indeed a draft is that designs are not firm. The Final Environmental Impact Statement (FEIS), however, should reflect a firm design with accurate and consistent transmission pole descriptions.

#### Impact Distances

The DEIS necessarily and appropriately uses bands to recognize and quantify impacts. The bands are typically characterized by distances perpendicular to the path of the proposed transmission upgrade. For instance, Table 3.11-9, Potential Impacts to Property Values – Nucla-Norwood Northern Alternative, shows that there are 5 units and 34 lots within 50 feet of the Nucla-Norwood Northern Alternative.

Attachment 2 shows impact band characterizations from the Land Use Impacts, Visual Resources, and Socioeconomics sections of the DEIS. Review of the characterizations summarized in Attachment 2 suggests two important ways to help the FEIS more usefully and consistently convey impact characterizations.

19B

- The Visual Resources section uses non overlapping bands along the transmission upgrade path. The Land Use Impacts and Socioeconomics sections use overlapping bands. I suggest that in every case, the FEIS use non overlapping bands. Overlapping bands can obscure and dilute valuable information.
- Each of the sections shown in Attachment 2 uses a different set of bands. It is important that the FEIS use, wherever possible, a consistent set of bands throughout all sections. This is why. The Socioeconomics section shows property value impacts. Impacts from the Land Use Impacts section and Visual Resources section undoubtedly influence property values. Presenting the information based upon the same set of bands will allow the property value impacts to be tied more closely to the Land Use Impacts and Visual resources impacts.

#### Impact Levels

- Table 3.11-9, Potential Impacts to Property Values – Nucla-Norwood Northern Alternative, shows "Potentially Moderate to High" impacts within 50 feet and within 300 feet and Low impacts within 1320 feet.
- Table 3.10-2, Summary of Visual Impacts for Nucla-Norwood Primary Alternatives, describes Potential Visual Impacts to Existing Residential Areas as simply High, Moderate or Low

19C

Is Potentially Moderate to High the same as Moderate to High? Does Potentially apply to both Moderate and High? The FEIS needs consistent impact level characterizations throughout.

- Page 2

### Right-of-Ways

- Table A-1.2-1, 115 kV Transmission Line Specifications, Summary of Design Characteristics, shows right-of-way widths of 75 feet for single poles and 100 feet for H-Frame poles.
- Figure 3.14-1, Profiles of electric fields for existing and proposed lines, and Figure 3.14-2, Average magnetic fields produced by proposed 115 kV line and existing 69 kV line, show "Edge of Right of Way (75 ft)" thus implying a 150-foot-wide right-of-way width.

The preceding bullets show that different parts of the DEIS make different presumptions about the meaning of a 75 foot right-of-way. The first presumption is that a 75 foot right-of-way is 75 feet wide and extends 37.5 feet to either side of the transmission line path. The second presumption is that a 75 foot right-of-way is 150 feet wide and extends 75 feet to either side of the transmission line path. Only one presumption is correct.

If the first presumption is accurate, then Figures 3.14-1 and 3.14-2 and DEIS text based upon those figures must be corrected. Resulting electric and magnetic fields 37.5 feet from the transmission path would be a factor of approximately four greater than those shown at the 75 foot distance.

If the second presumption is accurate then Impacts of the Primary Transmission Alternatives portion of the Socioeconomics section will require correction.

### Visual Resources

It is amazing that none of the 102 residences within the foreground distance zone (.5 miles) suffer high visual impact. Using my sister's home and property in an example, I am going to explain some of the reasons for that amazement. I suggest that you publish the FEIS only after you review the credibility of your DEIS findings for each of these residences. The following bullets explain:

- View from Residence Looking South towards Naturita Canyon, Plate VISUAL-6 from the DEIS Volume II shows a visual impact of the Nucla-Norwood Southern Alternative. The residence from which this photo was taken is I believe a few hundred feet south of my sister's home. I also believe that the residence from which the photo was taken is one of the ten residences indicated to suffer high visual impact in Summary of Visual Impacts for Nucla-Norwood Primary Alternatives, Table 3.10-2. Using Plate LAND-1 from DEIS Volume II, I estimate that this residence is approximately two miles from the simulated 115 kV transmission line. Page 1 of Attachment 1 is a reproduction of Plate VISUAL-6.

Page 2 of Attachment 1 contains photos taken from my sister's front yard and from photos taken from her property. In the photos you see a pole from the existing 69 kV transmission line. You also see a poles drawn in as an estimate of the incremental change that the preferred upgrade alternative would cause. The Summary of Visual Impacts for Nucla-Norwood Primary Alternatives, Table 3.10-2 (Potential Visual Impacts to Existing Residential Areas, Central Alternative) says this visual impact is moderate.

Compare the incremental changes show on pages 1 and 2 of Attachment 1. Is the incremental visual impact as viewed from my sister's home and from the adjacent road on page 2 indeed less than the incremental visual impact to the residence as viewed on page 1? It doesn't look that way to me.

- Page 3

19D

19E

- Look again page 1 of Attachment 1. You see simulated transmission conductors and aviation marker balls. One of the reasons that the aviation marker balls are more visible than the conductors is that they subtend a greater angle when viewed from the same location.

Let me clarify what I mean by subtend. Draw an imaginary line from your eye to the bottom of the ball. Then draw another line from your eye to the top of the ball. The angle between the two lines is the angle subtended by the ball. Now draw a similar set of imaginary lines from your eye to the bottom and top of the transmission conductor supporting the balls. The angle between these lines is the angle subtended by the conductor. The subtended angle of the ball is greater than the subtended angle of the conductor. One of the reasons that the ball is more visible than the conductor is that the ball has a greater subtended angle.

The Nucla-Norwood Central Alternative would traverse one of the three lots of approximately five acres that comprise my sister's property. Assume it would use the conductor described in the Summary of Design Characteristics, Table A-1.2-1. Also assume that the aviation marker balls shown in the simulation of Attachment 1 are 3 feet in diameter and two miles away from the viewer. As viewed from substantial portions of the traversed lot this conductor would subtend a greater angle than the aviation marker balls simulated on page 1 of Attachment 1.

If the Nucla-Norwood Central Alternative is constructed, will the visual impact to my sister equal or exceed the visual impact to the residence shown in Attachment 1 if the Nucla-Norwood Southern Alternative is constructed? The FEIS should address this.

- The DEIS specifies how it determines high visual impacts. The remaining paragraphs in the bullet compare my sister's situation if the Nucla-Norwood Central Alternative is constructed to those specifications.

Page 3.10-10 of the DEIS says, " High visual impacts are identified where: The project facilities would be located within a foreground distance zone of sensitive viewers and would result in strong contrast due to both the proximity and visibility of project features including poles, hardware, and conductors, and the lack of similar cultural features. High impact landscapes typically have a low VAC."

Page 3.10-9 of the DEIS defines Visual Absorption Capability (VAC) as, "The Visual Absorption Capability (VAC) of the landscape to visually screen or camouflage the project elements that would be viewed from the KOP. Variables assessed included topographic screening, slopes, vegetation screening and patterns, soil/vegetation colors, and site recoverability potential. Three levels of VAC were used – high, moderate, and low. The high rating reflects good, or suitable, site characteristics, and low VAC reflects poor site suitability."

My sister's home and property are indeed located within the foreground distance zone. As page 2 of Attachment 1 shows, she is a sensitive viewer who would see strong contrast due to both proximity and visibility of project features. As page 2 of Attachment 1 indicates, her view has a low VAC. The view from my sister's home easily falls within the definition for high visual impact. The DEIS does not recognize this. I suggest that the FEIS include a review of all the 102 residences within the foreground distance zone of the preferred alternative because it seems probable that other residences will see high visual impacts too.



19

## Socioeconomics

### Impacts

Table 3.11-10 is reproduced from page 3.11-22 of the Socioeconomics section of the DEIS.

Table 3.11-10  
Potential Impacts to Property Value – Nucla-Norwood Central Alternative

(from alignment)	Land Use	# of Units/Lots	Impact Level
Within 50 feet	Rural Residential	2/16	Potentially Moderate to High
Within 300 feet	Rural Residential	5/NA	Potentially Moderate to High
Within Corridor (1,320 feet)	Rural Residential	36/97	Low

19F

The FEIS should implement the following comments. These comments also apply to table 3.11-9, and tables 3.11-11 through 3.11-13 of the DEIS

- The number of lots "NA" within 300 feet while specific counts are given within 50 feet and 1,320 feet. There are indeed lots within 300 feet. The FEIS should include counts for each band.
- The impact level for the band within 1,320 feet includes only Low Impact levels. However, this band spans the "Within 50 feet" and "Within 300 feet" bands which contain "Potentially Moderate to High" impact levels. The FEIS should recognize that the outer band contains the inner bands. Adopting the suggestion in the section of these comments titled Consistency – Impact Bands would solve this problem.

### Environmental Justice

The Socioeconomics section of the DEIS addresses the environmental justice of the overall Nucla-Telluride Transmission Line Project. It does not address environmental justice consequences of choosing the Nucla-Norwood Central Alternative relative to choosing the Nucla-Norwood Southern Alternative. It does not address why 10 residences, each more than .5 miles from the Southern Alternative would endure high visual impacts while 102 residences within .5 miles from the Central Alternative would endure only moderate impacts. The FEIS must explain why.

19G

### Summary

Construction of the Nucla-Norwood Central Alternative will reduce the value of my sister's home. These comments are intended to insure that the FEIS fully and accurately addresses the areas that influence that value reduction. They show that the visual impact to her property exceeds the visual impact to a residence characterized as suffering high visual impact in evaluation of the Nucla-Norwood Southern Alternative. They suggest consistency changes that will aid evaluation of every alternative. Finally, they suggest that the FEIS address environmental justice when choosing the Nucla-Norwood Southern Alternative over the Nucla-Norwood central alternative.

19H

If there are questions or comments please call me at (925) 938-8735 or send E-Mail to [sia2@pwrval.com](mailto:sia2@pwrval.com).

- Page 5

Administrative Details

Both my sister and I would appreciate a copy of the FEIS. This will facilitate phone discussions about it. Please send one copy to:

Stanley I. Anderson  
Power Value, Inc.  
964 Mojave Court  
Walnut Creek, CA 94598

Note that the address above is different from the letterhead. I have ordered but not yet received stationery to reflect this update.

Please send another copy to:

Carolyn Erickson  
P.O. Box 482, Road W35  
Norwood, CO 81423

Sincerely,



Stanley I. Anderson  
President

cc San Miguel County Commissioners  
Bobby Bond, Tri-State  
Carolyn Erickson

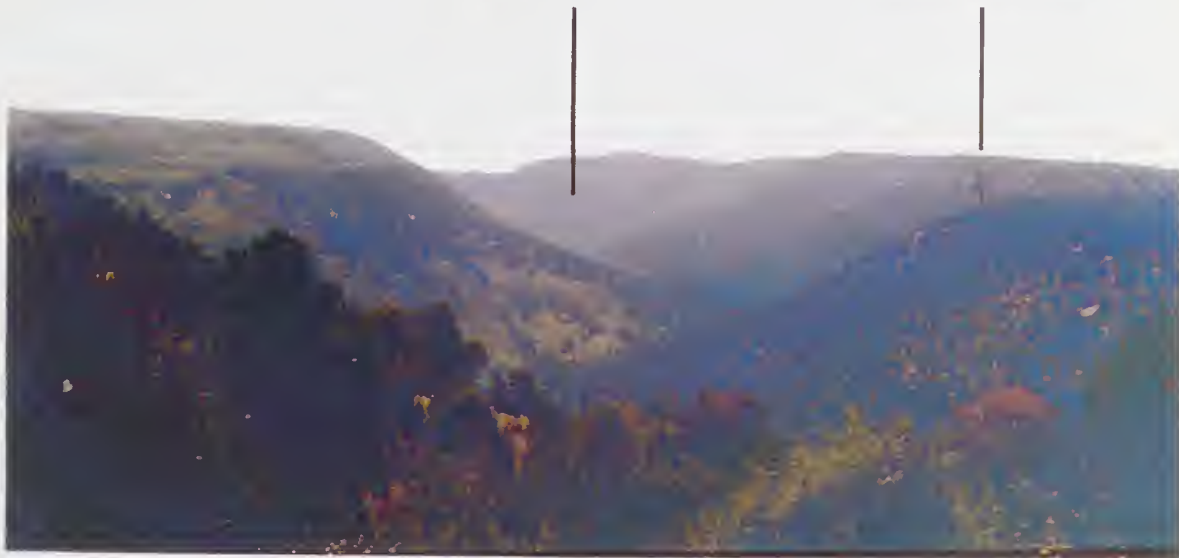
Photo from DEIS Volume II  
March 2001



*Photograph of Existing View*

Marker balls on ground wire

115 kV 3-Pole Structure



*Computer Generated Simulation of 115 kV Transmission Line*

## Nucla-Norwood Southern Alternative

*KOPB — View from Residence Looking South towards Naturita Canyon.*



Visual Impact  
Nucla-Norwood Central Alternative  
Carolyn Erickson Property



View From Front Yard



View From Road

Simulation Assumptions  
Current Pole Height – 34 feet  
Upgrade Pole Height – 80 feet

Attachment 2  
Page 1 of 1

**Impact Bands**  
**Used in March 2001 Draft Environmental Impact Statement**  
**Nucla - Telluride Transmission Project**

Band ----->	Transmission Path Centerline	50 feet	300 ft	1320 feet	.5 miles	3 miles	Beyond 3 Miles
Section							
Land Use Impacts - Section 3.8, Table 3.8-5							
		Number of Homes Within 300 ft					
		Number of Homes Within .5 miles					
Visual Resources - Section 3.10, Page 3.10-2							
		Foreground Distance Zone					
		Middleground Distance Zone					
		Background Distance Zone					
Socioeconomics - Section 3.11, Table 3.11-9							
		Within 50 feet					
		Within 300 Feet					
		Within Corridor					

## 19. Letter from Stanley Anderson, Power Value, Inc.

- 19A. Final pole heights will be determined once a corridor is approved by the Forest Service, BLM, RUS and San Miguel and Montrose Counties, and a final right-of-way has been negotiated with landowners. For purposes of the EIS analysis of the alternatives, average pole heights have been used, and the range of possible pole heights has been disclosed as described in Chapter 2.0, Section 2.2.1 and Appendix A-1, Section 1.2.2.
- 19B. (*See General Response 16*). The impacts of the proposed project and alternatives are evaluated on a resource to resource basis. Each issue is evaluated separately to ensure that the range of effects is documented. Impact areas (i.e. the extent of the impact band) are determined based on the type of effect that could occur and the geographic extent of the effect. For purposes of clarification, the FEIS sections on land use and socioeconomics have been modified to clearly distinguish the quantifiable impacts within the different distance zones or bands. Consistent bands are not used from resource to resource (e.g. land use, socioeconomics, visual resources), however, since impact effects would vary in geographic distance. For instance, land use impacts related to right-of-way restrictions would occur within and immediately adjacent to the right-of-way, while impacts to planned land uses or visual effects would extend further. With respect to the number of lots within the 50-foot to 300-foot distance band, this information was not developed in the GIS analysis. Estimates are provided for the number of lots within 50 feet and within the corridor as a whole.
- 19C. The EIS Chapter 3.0 Environmental Consequences, Analytical Framework Sections describe the types of impacts that may result from the proposed project and alternatives, and the impact definitions that are used to distinguish between qualitative levels of high, moderate and low effects (see Sections 3.2.2.1, 3.3.2.1, 3.4.2.1, 3.5.2.1, 3.6.2.1, 3.7.2.1, 3.8.2.1, 3.9.2.1, 3.10.2.1, 3.11.2.1, 3.12.2.1, 3.13.2.1, 3.14.2.1). In instances where the certainty of impacts to occur is unknown or questionable (i.e. due to the distribution of a resource within the corridor such as wetlands or the inconclusiveness of findings of existing studies and research, such as property value effects), the word 'potential' is used.
- Ranges of impacts, such as 'moderate to high' effects, have been used at the professional discretion of the EIS authors to describe the severity of impacts along an alternative corridor, as well as provide a comparison among the alternatives. Authors used ranges such as 'potentially moderate to high' where impacts were anticipated to vary between the moderate to high criteria range. Also see response to Comment 18A. Impact ranges such as 'moderate to high' are essentially interchangeable with descriptions of 'high to moderate'.
- 19D. Comment noted. The EMF section 3.14 has been modified in the FEIS to reflect the findings for a 75-foot right-of-way (e.g. 37.5 feet on either side the of the transmission line).
- 19E. Comment noted. Visual impacts to viewers within a foreground distance zone have been modified in the EIS to reflect 'moderate to high' impact ranges. It should be noted that the visual impacts to individual properties may vary substantially (from high to no identifiable effect) within the foreground distance zone, and would depend upon the degree to which intervening landscaping and buildings would obscure the 115 kV lines and poles. See comment response to 18A above regarding the assessment of impacts to individual properties.



- 19F. Comment noted. See response to Comment 19B and FEIS text and table changes.
- 19G. See response to Comment 19E. Executive Order 12898 (published in the Federal Register February 11, 1994) sets forth requirements for federal agencies to identify and address disproportionately high or adverse human health or environmental effects on minority populations or low income populations. The EIS analysis did not identify any disproportionate racial or economic conditions among populations living along the Nucla-Norwood Northern, Central or Southern Alternative corridors.
- 19H. Summary comments are addressed in the responses above. See responses to Comments 19A through 19G.

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NORWOD DISTRICT			
MAY 31 2001			
	ADCT.	REC.	INT.
DISTRICT OFFICE			
ICE			
MRS. MOORE			
MRS. STAFF			
MRS. DUBOIS			
LAMON, MIN STAFF			
STANLEY			
STANLEY, 3rd			
STANLEY, 3rd			
FILE			



20. Letter from Mark Crouch

20A(i). Comments noted. No response necessary.

District Ranger  
Norwood Ranger District  
P. O. Box 388  
Norwood, CO 81423

Date: May 17, 2001

Re: Draft Environmental Impact Statement (DEIS) for Nucla-Telluride Transmission Line Project

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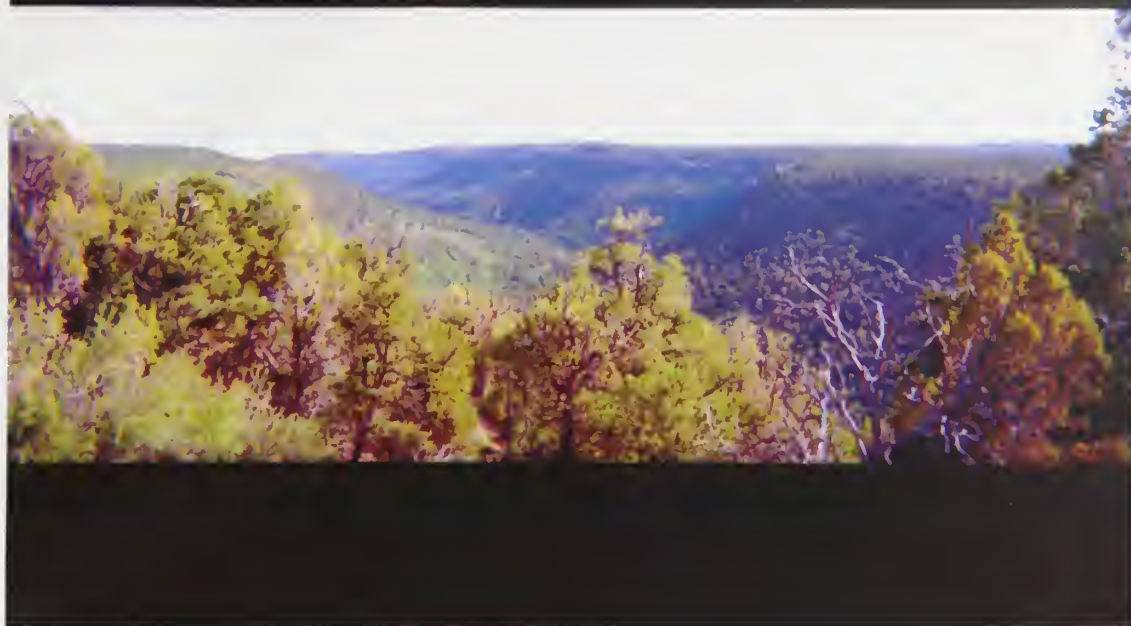
Friends of Naturita Canyon



20A









**20. Friends of Naturita Canyon - Mark Crouch**

20A(ii) Comments noted. No response necessary.



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District Ranger  
Norwood Ranger District  
P. O. Box 388  
Norwood, CO 81423

**POSTED**

Date: May 17, 2001

Re: Draft Environmental Impact Statement (DEIS) for Nucla-Telluride Transmission Line Project

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21A

Friends of Naturita Canyon

*Madeline B. Chambers*

*Met Deadline  
EW*

NORWOOD DISTRICT	
JUN 04 2001	
	DATE
DISTRICT RANGER	
ICE	
VEH. MGMT.	
REC. STAFF	
WILDLIFE CR	
LANDS. MGMT. STAFF	
SRV. ADSTCH	
MUS. MGMT. STAFF	
PROMISS CARD	
FILE	

21. Friends of Naturita Canyon - Madeline B. Chambers

Comments noted. No response necessary.



POSTED

NORWOOD DISTRICT	
JUN 01 2001	
DISTRICT MANAGER	
VICE	
VEG. MGMT.	
REC. STAFF	
WILDLIFE	
LANDS MGMT. STAFF	
SOIL ADJUST.	
BUD. MGMT. STAFF	
PROMISE DATA	
FILE	

22

District Ranger  
Norwood Ranger District  
P. O. Box 388  
Norwood, CO 81423

Date: May 17, 2001

Re: Draft Environmental Impact Statement (DEIS) for Nucla-Telluride Transmission Line Project

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22A

Friends of Naturita Canyon

Mitchell R. R.  
Box 12  
NORWOOD,  
1155 E 42 RD.

22. Friends of Naturita Canyon - Michael Pinto

Comments noted. No response necessary.

POSTED

23

District Ranger  
Norwood Ranger District  
P. O. Box 388  
Norwood, CO 81423

Date: May 17, 2001

Re: Draft Environmental Impact Statement (DEIS) for Nucla-Telluride Transmission Line Project

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Friends of Naturita Canyon

*Emily C. Haynes*

NORWOOD DISTRICT	
MAY 24 2001	
	ACT. INFO. INT.
DISTRICT RANGER	
VICE	
VEG. MGMT.	
REC. STAFF	
WILDLIFE	
CANON. MGMT. STAFF	✓
PRO. ADVICE	
VEG. MGMT. STAFF	
PROMISE CANY	
FILE	

23A

23. Friends of Naturita Canyon - Everly C. Haynes

Comments noted. No response necessary.



24

POSTED

District Ranger  
Norwood Ranger District  
P. O. Box 388  
Norwood, CO 81423

Date: May 17, 2001

NORWOOD DISTRICT			
MAY 29 2001			
	ACCT.	INFO.	INT.
DISTRICT RANGER			
VICE			
VEG. MGMT.			
REG. STAFF			
WILDLIFE/CCA			
LANDS, MIN. STAFF			
INFO AD/TECH			
PLN. (MGMT. STAFF)			
PROMISE CARD			
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Re: Draft Environmental Impact Statement (DEIS) for Nucla-Telluride Transmission Line Project

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*Kelley Miller*  
*Don Miller*

Friends of Naturita Canyon

24A

**24. Friends of Naturita Canyon - Kelley Milliron**

Comments noted. No response necessary.

25

POSTED

District Ranger  
Norwood Ranger District  
P. O. Box 388  
Norwood, CO 81423

Date: May 17, 2001

Re: Draft Environmental Impact Statement (DEIS) for Nucla  
Telluride Transmission Line Project

NORWOOD DISTRICT			
MAY 29 2001			
	ACCT.	INFO.	INT.
DISTRICT MANAGER			
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REC. STAFF			
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LANDS MGMT. STAFF			
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VEG. MGMT. STAFF			
HOUSE CAMP			
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*Steven D. Haynes*  
Friends of Naturita Canyon

11262 Ash Circle  
Thornton, CO 80233

25A

25. Friends of Naturita Canyon - Steven D. Haynes

Comments noted. No response necessary.



Date: May 17, 2001

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WALD. RECR				
LAMES, MEN. STAFF				
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**POSTED**

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Da D. Ca 29/05/0

Friends of Naturita Canyon

Alan D. Garceau  
P.O. Box 34  
NORWOOD, CO 81423 970) 327-4715  
4800 W-35 Rd.

26. Friends of Naturita Canyon - Alan D. Garceau

Comments noted. No response necessary.

27

POSTED

District Ranger  
Norwood Ranger District  
P. O. Box 388  
Norwood, CO 81423

Date: May 17, 2001

Re: Draft Environmental Impact Statement (DEIS) for Nucla-Telluride Transmission Line Project

NORWOOD DISTRICT	
MAY 24 2001	
	CCY. INFO. INT.
DISTRICT RANGER	
ICE	
VEG. MONIT.	
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PROMISE CARD	
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Friends of Naturita Canyon

27A

**27. Friends of Naturita Canyon - B. Scott and Holly Strong**

Comments noted. No response necessary.



**NORWOOD DISTRICT**

[illegible]

28A

Edward J. Apanel

28. Friends of Naturita Canyon - Edward J. Apanel

Comments noted. No response necessary.

POSTED

District Ranger  
Norwood Ranger District  
P. O. Box 388  
Norwood, CO 81423

Date: May 17, 2001

Re: Draft Environmental Impact Statement (DEIS) for Nucla  
Telluride Transmission Line Project

**NORWOOD DISTRICT** 29

MAY 23 2001

DIS. DIST. RANGER	ADJ. INFO. UNIT
TYPE	
DATE	
REMARKS	
APPROVED	
SIGNED	
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Friends of Naturita Canyon

Duncan Ferguson —

Walker Ferguson —

Susan Billings —

*[Handwritten signatures: Duncan Ferguson, Walker Ferguson, Susan Billings]*

29. Friends of Naturita Canyon - Duncan Ferguson, Walker Ferguson, Susan Billings

Comments noted. No response necessary.



POSTED

District Ranger  
Norwood Ranger District  
P. O. Box 388  
Norwood, CO 81423

Date: May 17, 2001

Re: Draft Environmental Impact Statement (DEIS) for Nucla-Telluride Transmission Line Project

NORWOOD DISTRICT			
MAY 23 2001			
	ACT.	INFO.	INT.
DISTRICT MANAGER			
TCE			
VEG. MONIT.			
REC. STAFF			
WILDLIFE			
LAND MGMT. STAFF	✓		✓
SHRUB MONIT.			
BUS. MONIT. STAFF			
PRELIM. CARD			
FILE			

30

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30A

The best alternative is to leave the transmission line in its current alignment, using the Nucla-Norwood Northern Alternative. Overall, this alternative has the least impact on the environment and will not cause new impacts on landowners. It is not good policy to move an existing transmission line to a new alignment. This guarantees conflicts with residents and causes serious disturbances to their quality of life. Although we prefer the Northern Alternative for these reasons, we recognize that the Nucla-Norwood Central Alternative is a reasonable compromise. The Central Alternative will resolve the situation in Redvale, while keeping a portion of the current alignment intact.

*Ryan Hay Landowner +*

Friends of Naturita Canyon

30. Friends of Naturita Canyon - Lynn Gray

Comments noted. No response necessary.

31

POSTED

District Ranger  
Norwood Ranger District  
P. O. Box 388  
Norwood, CO 81423

Date: May 17, 2001

Re: Draft Environmental Impact Statement (DEIS) for Nucla-Telluride Transmission Line Project

As members of Friends of Naturita Canyon, we are primarily concerned about the transmission line routing alternative known as the Nucla-Norwood Southern Alternative. After reading the text of the DEIS, we are glad to see that this is not either the Environmentally Preferred Alternative or the Agency Preferred Alternative. However, we are very concerned that this irresponsible alternative is being considered in the DEIS.

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Friends of Naturita Canyon

*Valerie J. Gibson*  
*Gloria Cox*  
*Saranne Ray*

NORWOOD DISTRICT			
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SRV. AD TECH.			
CLERK MGMT. STAFF			
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31A

31. Friends of Naturita Canyon – Valerie Gibson, Gloria Cox, Lavonne Royer

Comments noted. No response necessary.



POSTED

32

NORWOOD DISTRICT	
MAY 24 2001	
DISTRICT RANGER	
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VEG. STAFF	
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SUB. MGMT. STAFF	
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District Ranger  
Norwood Ranger District  
P. O. Box 388  
Norwood, CO 81423

Date: May 17, 2001

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Friends of Naturita Canyon

*Sincerely*  
*Jack M. Hills*  
*5-23-01*

32A

32. Friends of Naturita Canyon - Jack M. Hills

Comments noted. No response necessary.

POSTED

33

District Ranger  
Norwood Ranger District  
P. O. Box 388  
Norwood, CO 81423

Date: May 17, 2001

Re: Draft Environmental Impact Statement (DEIS) for Nucla-Telluride Transmission Line Project

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*Randy Hayes*  
Friends of Naturita Canyon

NORWOOD DISTRICT			
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	ACCT.	INFO.	INT.
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REC. STAFF			
WILDLIFE			
LANDS. MGMT.			
ENR. ADVICE			
STATE MGMT.			
PROMISES			
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33A

**33. Friends of Naturita Canyon - Randy Haynes**

Comments noted. No response necessary.



POSTED

District Ranger  
Norwood Ranger District  
P. O. Box 388  
Norwood, CO 81423

Date: May 17, 2001

Re: Draft Environmental Impact Statement (DEIS) for Nucla  
Telluride Transmission Line Project

NORWOOD DISTRICT	
MAY 22 2001	
	ADVIS. RES. UNIT.
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LANDS. MGMT. STAFF	
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PROMISE CARD	
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34

As members of Friends of Naturita Canyon, we are primarily concerned about the transmission line routing alternative known as the Nucla-Norwood Southern Alternative. After reading the text of the DEIS, we are glad to see that this is not either the Environmentally Preferred Alternative or the Agency Preferred Alternative. However, we are very concerned that this irresponsible alternative is being considered in the DEIS.

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*Dave Foley*

Friends of Naturita Canyon

34A

34. Friends of Naturita Canyon - Dave Foley

Comments noted. No response necessary.

35

MAY 29 2001

POSTED

District Ranger  
Norwood Ranger District  
P. O. Box 388  
Norwood, CO 81423

Date: May 17, 2001

Re: Draft Environmental Impact Statement (DEIS) for Nucla-Telluride Transmission Line Project

	ACCT.	INFO.	INT.
DISTRICT RANGER			
VICE			
VEG. MGMT.			
REC. STAFF			
WILDLIFE			
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BUS. MGMT.			
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Friends of Naturita Canyon

*Lila Swick*

SWICK

P.S. I am also opposed to the Nucla substation burning more coal to supply more power.

35A

35. Friends of Naturita Canyon - Lila Swick

Comments noted. No response necessary.





36. Friends of Naturita Canyon - James Royle

Comments noted. No response necessary.

PAUL C. SUNDERLAND

ATTORNEY

P.O. BOX 1834

OURAY, COLORADO 81427

PHONE (970) 325-4375

May 24, 2001

U. S. Forest Service  
 Norwood Ranger District Office  
 P. O. Box 388  
 Norwood, CO 81423  
 Attn: Steve Wells, Project Manager

NORWOOD DISTRICT	
MAY 24 2001	
DISTRICT MANAGER	
ASST. MANAGER	
REC. STAFF	
MAIL ROOM	
LANDS. MGR. STAFF	
SOIL AD TECH	
SUB. MGMT. STAFF	
PROJ. MGR.	
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37

POSTED

Re: Comment concerning Draft EIS for Nucla - Telluride Transmission Line

Dear Mr. Wells:

I represent Beaver Mesa LLLP, the owner of the 10,500 acre ranch which encompasses most of Beaver Mesa in San Miguel County. At their request, I am writing this letter to offer our comments on, and to express our deep concerns about, the incompleteness of the Forest Service's draft EIS concerning the proposed Nucla - Telluride Transmission line. My clients have six major concerns about the proposed power line and the draft EIS.

First, while the draft EIS devotes considerable attention to a discussion of the impacts of the proposed power line on the inhabited mesas of San Miguel County (Specie, Wilson and Sunshine), it largely ignores the very real effects the power line is likely to have on uninhabited Beaver Mesa. This is the case even though Beaver Mesa is the only one of the mesas which is in an almost pristine, undeveloped state and even though, because of the length of the route across Beaver Mesa, the proposal likely will have a greater impact on Beaver Mesa than on any other areas traversed by the line. Because of its vast, unspoiled size, Beaver Mesa is a unique place. It provides the single largest intact high mesa habitat for wildlife in the area. Despite this, the draft EIS is strangely almost silent on the impact of the line on Beaver Mesa.

37A

Second, the report ignores completely the significant potential for the line to cause devastating and irreparable damage to the property it crosses due to its risk of creating wildfires and necessary suppression efforts. This risk was recently brought home to Beaver Mesa when the existing Nucla - Sunshine line experienced a malfunction causing sparks which started four small wildfires in a remote area on Beaver Mesa. A fortuitous combination of chance discovery by some workmen on the mesa and weather conditions which were not conducive to fire resulted in these fires being suppressed before they did catastrophic damage. Unfortunately, it was quite wet at Beaver Mesa when power crews serviced the line. As a result, although the fires themselves did not result in widespread destruction, the power trucks which repaired the line did considerable damage to several miles of road and cut deep tire tracks across a previously undisturbed area from the road to the malfunctioning line. The EIS completely fails to consider whether or not the proposed new line will increase fire risk or the risk of damage resulting from maintenance or fire control or suppression. The EIS completely fails to consider whether the potential damage from

37B

Steve Wells  
May 24, 2001  
page 2

such fire-related risks outweighs the supposed benefits of the proposed line location or the supposed disadvantage of under ground cable (which would have virtually no fire risk after construction). The EIS completely fails to consider whether the very real potential for secondary damage to the environment from efforts to maintain and service the new line would tip the balance in favor of other alternatives to the proposed line. Each of these failures constitutes a fatal flaw in the EIS.

37B

Third, the EIS assumes the very conclusion which it was commissioned to study, namely that there is a need for a new power line and that the only reasonable alternative available is the proposed line. From the EIS, it is apparent that the purpose of the proposed line is to replace the existing backup for the existing Hesperus - Telluride 115 kV transmission line. The EIS simply assumes that such backup is "required" because of the "major hazards" (snow, avalanche, etc.) which may confront that transmission line. The EIS provides no empirical data to support the suggestion that such hazards, as opposed to poor design, construction or maintenance, are the cause of any outages which have occurred on that line. Having made this utterly unwarranted assumption, the EIS proceeds to stack further assumption on assumption. It assumes that the existing Hesperus - Telluride line cannot be upgraded in some fashion so as to maximize reliability in a manner that would be less expensive and less damaging to the environment (for example, undergrounding the line in avalanche areas, etc.). It assumes that the existing backup, the current 69 kV Nucla - Sunshine line, will not be able to meet *projected* needs fifteen years hence although it is fully capable of more than meeting existing needs. Of course, the validity of the demand projection is completely untested in the EIS - the EIS simply assumes its accuracy along with all of the other assumptions and makes no effort to analyze the effect on the demand projections which might occur if restrictions were imposed on further construction in Telluride and its environs or by mandating energy conservation measures.

37C

Having assumed the existence of a problem (supplying backup power to meet the assumed insatiable growth of power demand in Telluride) and then assumed the solution (building the new line), the EIS then proceeds to "study" that solution by comparing it against unrealistic alternatives (such as power generation) rather than against real alternatives (such as conservation to reduce demand or less major or costly improvements in the existing Nucla - Sunshine and Hesperus - Telluride lines which would make them more reliable).

Fourth, although it considers some minor routing alternatives, the draft EIS does not consider any other route for the proposed power line (in lieu of the proposal to build the line across Beaver Mesa), apparently on the erroneous assumption that the existing right-of-way for the current San Miguel Power Association Nucla - Sunshine line will be sufficient for the new line. Of course, this assumption ignores both the absence of clear right-of-way in many areas at Beaver Mesa and the fact that, where a recognized right-of-way does exist, it is only twenty feet wide and thus will be woefully inadequate for reconstruction. Alternative routes for the entire length of the

37D



37

Steve Wells  
May 24, 2001  
page 3

power line should have been considered and evaluated but were not, apparently because another assumption was made, that the existing route across Beaver Mesa was the only alternative which it plainly is not. The error of this assumption was compounded by the further assumption that use of the existing line route would reduce the number of miles of road which would need to be constructed. However, this assumption is equally in error, at least on Beaver Mesa where much of the existing line cannot be directly accessed from existing roads. In order to build and maintain a new line over Beaver Mesa, miles of new roads will have to be cut and maintained resulting in considerable damage to an otherwise nearly pristine environment. By completely failing to consider alternate routes (including possible routes across federal land south of Beaver Mesa) and by omitting the potentially significant right-of-way costs and environmental damage from its calculations, the EIS fails to meet its statutory purpose and in fact gives misleading information about the comparative cost (both monetary and environmental) of a Nucla - Telluride transmission line versus even the few alternatives which were studied.

37D

Fifth, the EIS completely ignores the huge disparity in the benefits and burdens of the proposed line. The adverse impacts of the proposed power line fall on relatively few landowners whose property must be damaged by the new line. But the benefit of the new line runs, in the case of Beaver Mesa which has no electric power, exclusively to those who suffer no disadvantage - the power hogs of Telluride. The few are being made to pay the cost (in diminution of land values, environmental damage and destruction of their solitude) for the pleasure of the many who wish to enjoy Telluride. In fact, Beaver Mesa will not even enjoy the potential for power as we are advised that the removal of the 69 kV line and its replacement with a 115 kV line will make it cost prohibitive for Beaver Mesa to EVER obtain power from this line. While such shifting of burdens may be permissible under the law, it is not right. Before the Beaver Mesa is destroyed, conservation and all other alternatives must be exhausted because once it is destroyed, Beaver Mesa will never again be the pristine environment it is now. Moreover, even if legal, forcing Beaver Mesa to suffer the costs of supplying emergency power to Telluride will carry a heavy price tag: the obligation on the part of Tri-State to compensate Beaver Mesa not simply for the land which must be taken for the power line and access roads but for the related damage which will be done to the ranch. Like everything else which might suggest a result other than the predetermined outcome of the EIS, this cost is totally ignored in the EIS in its evaluation of the cost effectiveness of alternatives.

37E

Finally, it is astonishing to my clients that the owners of a major property which will be forever damaged by the proposed line have never been contacted or consulted either by Tri-State or by your office in the process of evaluating the Tri-State proposal. The notion that my client's ranch should be sacrificed for the benefit of others without ever bothering to consult them about alternatives to the seizure and destruction of their ranch is utterly contrary to both the letter and the spirit of the law.

37F

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Steve Wells  
May 24, 2001  
page 4

Until the Forest Service conducts a valid EIS consistent with its statutory mandate, an EIS which considers all possible alternatives in a manner in which the outcome is not a foregone conclusion, we request that a no action decision be issued. If, notwithstanding the issues raised concerning the validity of the draft EIS, the Forest Service chooses to issue a favorable final action on the Tri-State proposal, we believe the action will be illegal and incapable of withstanding challenge.

37F

Sincerely,



Paul C. Sunderland

cc: Beaver Mesa, LLLP

### 37. Letter from Paul Sunderland

- 37A. The DEIS addresses the impacts of the proposed 115 kV transmission line to Beaver Mesa. The biological resources on Beaver Mesa are shown graphically in DEIS and FEIS Volume II, *Plates BIO-1* through *BIO-4*, and are described narratively along with other resources in the corridor, in DEIS Volume I, Section 3.6. Similar information is presented for Beaver Mesa in the Geology, Paleontology and Minerals Section 3.3, Soils Section 3.4, Water Resources Section 3.5 and Cultural Resources Section 3.7. Although field reconnaissance was not conducted for Beaver Mesa due to the previous landowner's wishes (B. Carstens, February 24, 1998), methods used for the DEIS analyses included review of existing literature and studies, consultations with federal, state and local agencies familiar with Beaver Mesa, aerial photo interpretations, and limited field reconnaissance from public roads. As indicated by the commenter, Beaver Mesa is undeveloped. Consequently, the DEIS Land Use Section 3.8, Visual Resource Section 3.10 and Noise Section 3.13 did not specifically address Beaver Mesa.

Information regarding Beaver Mesa has been expanded in the FEIS, however, based upon the current owners' consent to allow field studies. Field studies were conducted in the summer of 2001 to document the proposed project's impacts to fen wetlands and scenic quality, across the mesa. FEIS Sections 3.6 and 3.10. have consequently been modified to include the results of these studies. The FEIS also addresses the feasibility of undergrounding the 115 kV transmission line across Beaver Mesa. These study results are included in FEIS Sections 3.3, 3.4, 3.5, 3.6, 3.8 and 3.10.

- 37B. The proposed 115 kV transmission line will reduce the potential for wildfires on Beaver Mesa in comparison to the existing conditions. A primary purpose of a static line on the top of transmission poles is to protect the conductors and insulators from lightning strikes. The existing 69 kV line does not have a static line on the top of the poles and is consequently susceptible to lightning strikes and related power outages. The replacement of this 50-year-old facility with the proposed 115 kV transmission line would result in the addition of this safety design feature.
- 37C. See response to Comment 15A and B for information regarding purpose and need, and questions raised regarding the ability of the Hesperus-Telluride Line to meet reliability goals of the project.

Regarding the ability of the Nucla-Sunshine 69 kV line to meet backup reliability needs, the FEIS discusses the limitations of this line's capacity (13 MW) in Section 1.4.3. Reference should also be made to Tri-State's Comment 6A regarding the capacity of the Nucla-Sunshine 69 kV line and the response to this comment that has been incorporated into the FEIS.

With respect to the validity of the demand projections, AESC independently reviewed Tri-State's and SMPA's power studies and projections and found them to be reasonable and valid for planning purposes. Power projections provided by Tri-State and SMPA are also consistent with the 3% annual growth rate assumed for the Telluride Region in the Telluride Area Land Use and Transportation Report, prepared by the Citizen Planning Advisory Committee (October 1998).

- 37D. No alternatives to the existing 69 kV alignment were considered across Beaver Mesa based upon the initial scoping discussions held with the previous landowners in 1998. (B. Carstens, February 24, 1998). No alternatives across Beaver Mesa were



suggested or requested by the previous landowners, and access to the property for the environmental studies was denied. Recently, with the release of the DEIS in March 2001, the Forest Service learned that the Beaver Mesa property was sold in 1999 to the current landowners, D. and J. Scala. Based upon this comment letter, a meeting was held with P. Sunderland and the Scalas on June 27<sup>th</sup>. As a result, the FEIS has been expanded to further address the potential effects of the proposed overhead line across Beaver Mesa, as well as the feasibility of undergrounding the 115 kV line across Beaver Mesa. See Response to 37A.

Based upon the meeting with P. Sunderland and D. and J. Scala, no other overhead alternative routes across Beaver Mesa were suggested or requested for inclusion into the FEIS. An alternative of following the San Miguel River and State Route 145 was suggested, however, and has been considered as described in Section 2.3.1 (*see General Response 12*). Alternative routes south of Beaver Mesa had been considered early-on during scoping as shown in FEIS, Volume II, *Plate PROJECT-9*, and discussed in FEIS, Volume I, Section 2.3.1.

With respect to issues raised regarding the need for new access roads, the DEIS analyses assume no new access roads would be built on Beaver Mesa. This assumption is set forth in DEIS Volume II, *Plates PROJECT-6* and *-7*. The existing roads and trails were identified from aerial photointerpretation, and are illustrated in *Plate TRANS-1*. As shown in *TRANS-1*, the main ranch road generally parallels the Nucla-Sunshine 69 kV line for approximately 6 miles at distances ranging from 0 to 0.5+ miles away. The analysis assumed that construction access would be via this main road and other adjoining spur roads. Where road access is not available, the EIS analysis assumed that overland construction vehicles would be used to access the right-of-way. See Appendix A-1 regarding overland construction techniques. Vegetation removal may be required in some overland construction areas where oak brush is too dense for vehicles. No new access roads would be necessary, however.

- 37E. (*See General Response 14*). The socioeconomic section of the EIS (3.11) discusses the potential for the project to affect property values. This analysis concluded that property values were likely to be affected to varying degrees ranging from high to low in severity depending upon a number of variables. Visual effects from the line were likely to be the primary factor affecting property values. Variables affecting the degree of impact to property values would be unique and specific to each property, and would include such factors as whether the property faces the line or whether the line is behind the property, whether the line detracts from the views or use of the property (agriculture), what natural vegetation or topography buffers the impact, how far away the line is located, the size of the parcel affected, etc. In the case of Beaver Mesa, these variables would also vary on the property, which is in excess of 10,000 acres and is crossed by the existing Nucla-Sunshine 69 kV line as well as WAPA's 345 kV and 230 kV lattice lines. With respect to the issue of the few bearing the impacts for the benefit of Telluride, the EIS contains information pertinent to this issue. The Land Use, Socioeconomic and Visual Resource sections disclose the approximate number of lots and homes that would be affected along the corridor. The benefits to Telluride are disclosed in Chapter 1, Section 1.3.2.

The EIS is an informational document only, and its purpose is to disclose the environmental effects of the proposed project and alternatives for federal agency decision-makers and the public. It is important to note that NEPA does not require a cost-benefit analysis. The Forest Service and BLM will consider information in the EIS when deciding whether to permit the project on federal lands, and if so, along which corridor and under what conditions. The RUS will consider information in the EIS in



deciding whether to provide financing for the project. It is beyond the scope of an EIS to prepare assessments of individual property value impacts. As noted above, such effects could vary significantly from property to property depending upon unique and site specific conditions.

Tri-State is in the process of requesting a special use permit from San Miguel County. Private landowner issues may be further addressed by the county during the special use permitting hearings that are scheduled to be held in the autumn and winter of 2001/2002.

- 37F. See response to Comments 37D and 37E. In response to this comment, a meeting was held on June 27, 2001, and additional information and alternatives have been incorporated in the FEIS.

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NORWOOD DISTRICT	
APR 23 2001	
DISTRICT MANAGER	ASST. INFO. UNIT
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VEG. MGMT.	
REC. STAFF	
WILDLIFE	
LANDS, M.N. STAFF	
BIO. AD/TECH	
BUS. MGMT. STAFF	
PROMISE CARD	
FILE	

HARPER MEEK &amp; KRIS BARTOSIAK

69 STREET Road

NEWTOWN SQUARE PA 19073

Tel: (610) 644-0502 Fax: (610) 644-1361

POSTED

Steve Wells, Project Manager  
 U. S. Forest Service  
 Norwood Ranger District Office  
 P. O. Box 388  
 Norwood, CO 81423

April 11, 2001

Mr. Wells:

Please consider the following as a formal comment to the Draft Environmental Impact Statement for the Nucla-Telluride Transmission Line Project. We own property in both the town of Telluride and on Specie Mesa, and are quite interested in this effort.

First, I must commend your for a remarkably complete and accurate DEIS. I appreciate the opportunity to comment at this stage, and my comments focus on several points to correct what may simply be a clerical or reproduction error, while apparently minor, might result in several significant misunderstandings or misstatements.

Specifically, I am concerned that the impact of underbuilt or re-routed 69kV transmission and distribution lines are not clearly addressed. The DEIS is occasionally unclear as to which portions of the existing 69kV line is to be removed, to remain unchanged, or alternatively to be underbuilt to the proposed 115kV line, or alternatively rebuilt as an independent distribution system.

An example of this lack of clarity is in Volume II, plate PROJECT 6, where it is unclear if segment 13, Mile marker 10.5 to 14.5 is illustrated as 69kV rebuilt to 115kV, 69kV rebuilt to 115kV with 69kV distribution underbuilt, or if a new 69kV distribution system is proposed. Review of the project description and discussion of alternatives in Volume I do not substantially clarify this point. Discussion of the underground option for the 115kV line in this section of the project are similarly unclear as to the disposition of the existing 69kV segments. This confusion may be an artifact of the reproduction of the plate in question. The legend on this plate may be in error with respect to the section in question. This segment of the project is illustrated on my copy as red with a blue hash mark, but there is no corresponding entry in the legend. Also, the legend on plate PROJECT-6 is in conflict with a similar legend and detail given on plate PROJECT-7, but in any case it is unclear what is proposed. Additionally, plate PROJECT-8 is similarly unclear as to the disposition of the 69kV distribution functions in this segment.

The assessment of the impact of re-routed, removed, underbuilt, or undergrounded 69kV distribution and transmission lines is critical in the evaluation of these alternatives. While in general the 69kV systems are to be 'upgraded' to 115 kV systems, there is significant visual impact difference between the possible treatments of the existing 69kV system. These systems

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may be underbuilt, undergrounded, re-routed or removed, and these alternatives all have substantial, but different impacts. In particular, if the existing 69kV systems are to be rebuilt as separate lines but not underbuilt to the 'new' 115kV line, the proliferation of support poles, access roads, installation impacts and permanent substantial visual impacts are substantially understated by the DEIS. While this comment is true of all segments of all alternatives, the DEIS is particularly vague or lacking these details in segments 13 and 14 of the Norwood-Telluride and Norwood-Sunshine alternatives.

38B

The greatest unaddressed impact would be the rerouting of the existing 69kV lines. While the DEIS occasionally implied that this is not intended, the lack of definitive clarity is a point of significant concern. If the 69kV systems are to be re-built independent of the replacement 115kV systems, either in parallel on different alignments, the visual, construction and other impacts have been badly understated by the DEIS. I can find no reference to these potential impacts.

38C

If the 69kV systems are to be underbuilt, the visual impacts are somewhat understated. While the overall pole height is apparently unchanged, the number of conductors, the conductor visibility, and the total project visibility is somewhat understated. As a general point, most of the DEIS assumes replacement of the 69kV systems with the proposed 115kV systems, apparently without replacement of the 69kV local distribution. This is accurate only where there is to be no replacement of the 69kV sections, and the DEIS is unclear where this is to be the case.

Specifically, I recommend the following corrections or clarifications to the DEIS:

1. Clarification of plates PROJECT-6 -7, and -8, in Volume II of the DEIS to clearly illustrate both 115 kV and 69 kV systems that will result if the proposal is constructed.
2. For each segment or segment portion where there will be some reconstruction of the 69kV systems, the DEIS should specifically indicate that these systems are to be built and describe fully the scope and location of these systems
3. Where the 69kV systems are to be rebuilt, and where this rebuild is other than an underbuild of the 115 kV system, the DEIS needs to address this incremental construction and resulting impact.

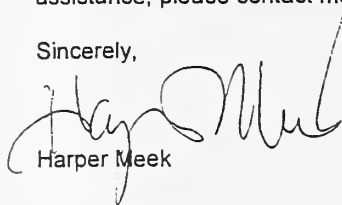
38D

38E

38F

Thank you for your attention to this matter. If these comments are unclear or if I may be of other assistance, please contact me at the address or phone numbers above.

Sincerely,



Harper Meek



---

**38. Letter from Harper Meek**

- 38A. The locations where the 115 kV transmission line will be underbuilt with SMPA's distribution lines are shown graphically in FEIS Volume II, *Plates PROJECT-3, -4, -5, -6, and -7*. EIS Volume I, *Table 2.2-2* lists by link and mile marker, for each alternative, the actions that will be taken, including where the 115 kV line would be underbuilt with distribution lines, and where distribution lines would be undergrounded. The FEIS Project plates have been modified to more clearly show this designation.

With respect to *Plates PROJECT-6 and -7*, Link 13, mile markers 10.5 to 14.3, the 115 kV transmission line is proposed to be underbuilt with distribution lines along this section. *Figure 2.2-1* and *Plate VISUAL-12* show the pole design for the 115 kV transmission line with the distribution underbuilt.

- 38B. The assessment of impacts has taken into consideration the changes in SMPA's distribution system, including where new distribution lines will need to be constructed, separate from the 115 kV line, as well as where the distribution lines will be undergrounded. As shown in *Plates PROJECT-6 and PROJECT-7*, new distribution lines were assumed to be constructed to the west and then north of the Oak hill Substation. In subsequent discussions with SMPA regarding their DEIS comment letter, SMPA representatives have also indicated that this new distribution line between the Oakhill Substation and the new Norwood Substation may instead be routed to the north and west of the Oakhill Substation as is now shown in the revised *Plates PROJECT-6 and -7*. Both of these options are addressed in the pertinent environmental sections of Chapter 3.0 of the FEIS.
- 38C. The existing 69 kV line will not be rerouted. It will either be rebuilt as a 115 kV line, be converted to a distribution line, or removed, depending on the alternative. In order to maintain distribution service to its customers, SMPA will need to extend distribution service in some areas once the 69 kV line is removed or replaced with the 115 kV line. The proposed service extensions are shown, by alternative in EIS Volume II, *Plates PROJECT-3 through -7*, respectively. The impact discussions of each alternative have been modified in the FEIS to clarify this issue.
- 38D. Comment noted. Plates have been clarified.
- 38E. The 69 kV line will not be reconstructed, rebuilt, or relocated as a 69 kV system. Consequently, the FEIS does not address such effects. Impacts of rebuilding the 69 kV line as a 115 kV line are addressed in the Chapter 3.0 sections entitled '115 kV Transmission Line Effects'. Portions of the 69 kV system that will be retained and converted to distribution service are described in the Chapter 3.0 sections entitled '69 kV Transmission Line and Distribution System Effects'. New distribution lines that would be constructed in order to maintain service to SMPA customers are also described in Chapter 3.0 sections entitled '69 kV Transmission Line and Distribution System Effects'.
- 38F. See response to Comment 38E above.

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MAY 21 2001  
Received MCF

Stanley Abrams  
333 Silver Pick Road  
P.O. Box 1694  
Telluride CO, 81435

See  
POSTED

39

U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, Colorado 81423  
Attn. ~~Steve Wells~~, Project Manager

May 17, 2001

Re: Nucla to Telluride Transmission Line

Dear Steve,

In response to your Draft Environmental Impact Statement, let me begin by saying that the impact, of the above ground 115kv transmission as proposed, would be devastating to the Mesas involved, now and forever. Except for a catastrophic natural disaster, I can't imagine anything more damaging to the environment. We should all be aware by now, of the collective careful efforts, made by the entire community in the Telluride region, to protect all our natural resources whenever possible.

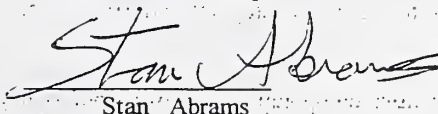
The current overhead 69kv transmission line crossing the Mesas is bad enough, but that was done at a time in our history, when the value to our community of unobstructed open space, was not understood, as we know it today. In any event alternatives were limited and the technology for undergrounding a 115kv transmission line was probably non existent.

That is no longer the case.. The means of serving the communities in need of power, without damaging the natural environment is well within our grasp. Which ever route is chosen by the BOCC to accomplish that need, Tri-State and San Miguel Power must first do no harm...a harm to last an eternity.

Without question, Undergrounding the line will have the least impact in the long run. I firmly believe, that in this day and age, Tri-State/San Miguel Power should stop looking for the cheapest solution to this problem and avoid looking to others, to pay for what is obviously their own capital improvement.

As president of Ptarmigan Ranch Owners Association and as an appointed active member of the San Miguel County Open Space Commission and a full time resident of Wilson Mesa. I believe I have a sense of where we should be going with this. From conversations with various owners on the Mesas (*somewhat different from my thoughts above*), there is probably a willingness on their part, to make a reasonable contribution, to the added cost of undergrounding. What I have heard, over and over from property owners, is that although wider rights of way, would be needed for the overhead transmission line, requiring condemnations and related costs, plus the loss of property values, due to adverse visual impacts, as also discussed in the DEIS, there remains a need to include in the EIS (forthcoming?), those estimated costs. That would complete the cost comparison chart, as shown in your study, and very necessary to better understand and determine the cost difference, if any, for undergrounding the line.

Thank you for you help.

  
Stan Abrams

cc:bocc

39A

**39. Letter from Stanley Abrams**

- 39A. The DEIS documents the general cost ranges associated with the overhead and underground transmission technologies. Underground costs have been revised in the FEIS to reflect updated information from Power Engineers (see Appendix A-5, September 2001). Also see FEIS Volume I, Summary and Section 2.2.1.4.

The cost estimates contained in the EIS are solely for purposes of informing the public and decision makers on the magnitudes of costs associated with the various alternatives and technologies. Given this objective, it is unnecessary and beyond the scope of the EIS analysis to develop or consider detailed cost differences for individual properties. (*see General Response 14*). Actual costs of both technologies could vary substantially from property to property depending on a number of variables including the size of the property; the amount of the property crossed or impacted by the project; the location and manner in which the transmission line would cross the property; the specific visual effects of the overhead transmission system given on-site landscape and viewing conditions; site-specific geotechnical, soils, water resource and slope conditions; the width and conditions of existing easements previously granted for the 69 kV line; and relevant property values. As described in EIS Section 3.11, the degree to which property values would be affected would also depend on a number of factors that could vary substantially from property to property (See Land Value Impacts, Section 3.11).

While individual property cost issues may vary substantially from these general estimates, the overall magnitude of cost differences amongst the alternatives and technologies is expected to remain similar. Individual landowner property issues may be considered by Montrose and San Miguel Counties as part of Tri-State's Special Use Permit application hearings.







United States  
Department of  
Agriculture

Forest  
Service

Grand Mesa.  
Uncompahgre and  
Gunnison  
National Forests

2250 Highway 50  
Delta, CO 81416  
Voice: 970-874-6600  
TDD: 970-874-6660

File Code: 2720/1950-3  
Date: May 23, 2001

Mr. Rob Roberts  
2300 S. Milwaukee Street  
Denver, CO 80210

Dear Mr. Roberts:

Thank you for your letter dated May 8, 2001 requesting the deadline for comments on the Draft Environmental Impact Statement (DEIS) for the Nucla-Telluride Transmission Line Project be extended for "a month or two". I appreciate your compliment on the analysis. My staff and environmental contractors have worked hard to assure the DEIS is as complete as possible.

I have given your request careful consideration. I have already extended the comment period 15 days beyond the 45-day comment period in our regulations to its current ending date of May 31, 2001. This has given the public 60 days to read, question, and comment on the DEIS. We published the notice of availability in the Federal Register and mailed approximately 1100 copies of the DEIS to the public and local, state, and federal agencies on March 30, 2001. While I am sensitive to the need for the public to have adequate time for comment on a federal land use proposal, I must also be sensitive to requests from the public and proponent to not prolong the process unduly. We are already receiving comments from those individuals and organizations wishing to comment.

For these reasons, I regret I am unable to approve your request for an extension of the comment period. I am confident that those individuals, organizations, and agencies who wish to comment on the DEIS will do so within the 60-day period allowed.

I look forward to receiving your comments.

Sincerely,

/s/ Larry M. Hill (for)  
ROBERT L. STORCH  
Forest Supervisor

cc:  
Norwood RD

✓ VPW  
✓ RUS  
✓ BLM



Caring for the Land and Serving People

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40. Letter from Rob Roberts dated May 8, 2001, received by USFS May 11, 2001

40A. Comments noted. See response provided by the U.S. Forest Service below.

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**POSTED**

**Rob Roberts**  
 PO Box 22000, PMB 507  
 Telluride, CO 81435  
 303 756-8522

**NORWOOD DISTRICT**  
 MAY 21 2001

	ADCT.	INFO.	UNIT
DISTRICT RANGER			
TRF			
VEG. MGMT.			
REC. STAFF			
WILDLIFE			
LANDS. MGMT. STAFF			
GRD. ADVISE			
VEG. MGMT. STAFF			
STATIONARY CAMP			
FILE			

41

May 8, 2001

Steve Wells, Project Manager  
 U.S. Forest Service  
 Norwood Ranger District Office  
 P.O. Box 388  
 Norwood, Colorado 81423

Dear Mr. Wells,

My family owns a home and approximately 220 acres in Ptarmigan Ranch on Wilson Mesa; the current Nucla-Telluride transmission line runs through a great deal of our property. I am writing as an individual and as a representative of the homeowners in Ptarmigan Ranch to provide you feedback on the Forest Service's draft Environmental Impact Statement.

All of the home-/landowners are extremely concerned about Tri-State's plan to upgrade the existing 69kV line to 115kV. Our greatest concern is how the 115 kV line would mar what all of us agree is the area's most cherished but fragile asset—its natural and dramatic beauty. As your report so clearly demonstrates, the increased height of the new poles and increased visibility of the elevated conductors would dramatically deteriorate the vistas throughout much of the Ptarmigan Ranch area, as well as in many other areas on the Mesas. Thus, we strongly favor undergrounding the new line through all areas where undergrounding is possible.

41A

Residents in Ptarmigan (and in the San Miguel region more generally) are passionately committed to preserving the relatively unspoiled beauty of the area and to minimizing development that compromises that beauty. A recent example of this commitment was the broad-based community support for the Schmid Family Ranch project where individuals and private and government groups raised a great deal of money to preserve the 100+ year ranch. (As you know, the power line runs adjacent to the Schmid ranch.) An 80-foot power line running through this area would be a major step in the wrong direction. In terms of maintaining the visual beauty and having minimal impact on land usage, undergrounding is the option that clearly makes the most sense.

41

All of the impacted homeowners in Ptarmigan ranch are willing to bear some of the cost of undergrounding, but we feel strongly that the Tri-State should bear much more of the cost than is suggested in the EIS. Most significantly, we feel strongly that it is wrong to ask private land owners to shoulder all the extra expense required for undergrounding if undergrounding is in fact the only viable method that makes the upgraded line environmentally acceptable. If approval is to be granted, why shouldn't Tri-State be fully responsible for upgrading the line using a method that is environmentally permissible—i.e. undergrounding?

41A

On a more specific note, it does not appear that the EIS estimates of the cost differences between overhead and underground lines took account of all of the savings Tri-State would gain using undergrounded lines, for example-- the savings from not having to obtain the needed 75-100 feet right-of-way that would be necessary for overhead lines. In sum, we would like to see a more equitable analysis of the costs of undergrounding.

41B

In closing, I should mention that I have been in contact with many landowners on the Mesas, all of whom are in general agreement with the opinions expressed here. Finally, you should know that we are very appreciative of the thoroughness and thoughtfulness of the Forest Service's EIS—it is an impressive piece of work.

Sincerely,



Rob Roberts

CC: Art Goodtimes, San Miguel County Commissioner  
Elaine Fischer, San Miguel County Commissioner  
Vern Ebert, San Miguel County Commissioner

---

**41. Letter from Rob Roberts received by USFS May 21, 2001**

41A. Comments noted. Tri-State's undergrounding policy is presented in the EIS Chapter 2.0, Section 2.2.1 along with the positions of the Forest Service, BLM and RUS regarding this policy. While the Forest Service and BLM take no position regarding this policy, the RUS finds it a reasonable and prudent policy. To date, the RUS has never funded undergrounding transmission lines in rural areas. Private landowner issues may be addressed further during the San Miguel and Montrose County hearings regarding Tri-State's application for a Special Use Permit.

41B. See *General Response 14*.

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PAUL A. ALLAIRE  
P.O. Box 1600  
Stamford, CT 06904

POSTED

42

NORWOOD DISTRICT	
MAY 21 2001	
DISTRICT	
TCE	
VEG. MGMT.	
REC. STAFF	
WILDLIFE	
LANDS. HBL.	
SOIL & CATCH	
BASE MGMT.	
DISCUSS. COMM.	
FILE	

May 16, 2001

Mr. Steve Wells  
Project Manager  
U. S. Forest Service  
Norwood Ranger District Office  
P. O. Box 388  
Norwood, Colorado 81423

Dear Mr. Wells:

I write to provide you my views on the draft Environmental Impact Statement re the Nucla-Telluride Transmission Line sent by District Ranger Edson. First, I want to commend you for an excellent draft report, it is comprehensive and understandable.

I bought 95 acres of property at 0700 Elk Crossing, Ptarmigan Ranch in East Wilson Mesa. This is an area of the greatest natural beauty which was the major factor in my decision to buy.

I have invested to build a home in a manner that does not detract from that nature and have further invested to conserve the Schmid Family Ranch to preserve this beauty.

I strongly believe that the proposed upgrade of the 69kV line to 115kV would, as shown by the draft report, do significant and permanent environmental damage to the Mesa. It would severely damage the dramatic natural beauty.

42A

The existing line crosses the entire front of my property and, although not attractive, is historical and something we have become accustomed to in western landscape. The 115kV proposal would violate the landscape with its height and size.

If an upgrade is deemed to be necessary, I would strongly support an underground approach which would have the least impact on land use and our scenic beauty. It also preserves the value of all of the property in the area. This is an option that I believe all the landowners would support.

I understand that this is possibly more expensive than the Tri-State proposal, but there clearly would be increased cost for Tri-State if they attempt to push through an option that the property owners strongly oppose.

I personally would be willing to assume some of the cost of undergrounding the line as removing the existing 80kV line would be an improvement. But I believe Tri-State should bear most of the cost if this is the only environmentally acceptable approach to providing the power requirements of the area.

Sincerely,

A handwritten signature in black ink, appearing to read "P-A Allaire", with a large, sweeping loop at the end.

Paul A. Allaire

PAA/crl

Copy: Art Goodtimes, San Miguel County Commissioner  
Elaine Fischer, San Miguel County Commissioner  
Vern Ebert, San Miguel County Commissioner

**42. Letter from Paul A. Allaire**

42A. Comments noted. See *General Response 14* and Response to Comment 41A.

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LAW OFFICES  
JOHN G. IRWIN

April 23, 2001

U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, Co. 81423  
Attn: Steve Wells, Project Manager

NORWOOD DISTRICT	
APR 24 2001	
	MYST. INFO. I.W.T.
DISTRICT MANAGER	<input checked="" type="checkbox"/>
ICE	<input type="checkbox"/>
VEG. MONIT.	<input type="checkbox"/>
REC. STAFF	<input type="checkbox"/>
WILDLIFE	<input type="checkbox"/>
LANDS. MGMT. STAFF	<input checked="" type="checkbox"/>
SOIL ASSESS.	<input type="checkbox"/>
SUB. MGMT. STAFF	<input type="checkbox"/>
PROMISE CARD	<input type="checkbox"/>
FILE	<input type="checkbox"/>

POSTED

P.O. BOX 2193  
226 W. COLORADO AVENUE  
TELLURIDE, COLORADO\* 81435  
TELEPHONE (970) 728-6670  
TELEFAX (970) 728-6711  
\*also admitted in California

43

RE: Nucla-Telluride Transmission Line Project

Dear Steve,

Pursuant to Garry W. Edson's letter of March 29, 2001, I provide the following comments to your Draft Environmental Impact Statement ("DEIS") for the proposed Nucla-Telluride Transmission Line Project.

My wife Victoria and I own approximately 1700 acres in the southern portion of Specie Mesa Ranch. Our property lies between Top of the World to the west, the Corzine property to the east, and is bordered by County Road P-52 and the "Stock Drive" to the south.

The existing 69kV transmission line crosses the southern portion of our property approximately parallel to County Road P-52 and the "Stock Drive".

In 1999 and 2000 we granted Conservation Easements to the San Miguel Conservation Foundation which permanently reduced the 17 homesites on our property to a total of 6 homesites.

We have reviewed the DEIS and each of its Summaries, and strongly support the underground alternative which the DEIS identifies as the "Environmentally Preferred Alternative" on page S-18. The numerous Computer Generated Simulations contained in Volume II of the DEIS clearly indicate the visual impacts that would result on the Mesas if the larger 115Kv facilities were installed above-ground.

We noted the suggested above-ground Alternate Route on Plate Project-9 which would direct the new 115Kv line south and east on County Road P-52 and the "Stock Drive". Undergrounding the new line adjacent to the County Road and the Stock Drive would reduce disturbance to natural vegetation and improve access to the new line for maintenance, etc. The "Stock Drive" is actually located on our property and we would be willing to grant an easement for the undergrounding of the new line in the "Stock Drive".

43A

43

LAW OFFICES

JOHN G. IRWIN

We have reviewed Tri-State's Board of Directors Policy re the undergrounding of transmission lines which calls for owners to pay the "increased cost" of undergrounding on their property and we are willing to stand that expense as it is applied to all other owners similarly effected. As we understand it, "increased cost" means the difference between the cost of above-ground facilities and underground facilities. We've heard several theories as to how the "increased cost" is calculated including suggested allowances to owners for the need for wider easements, diminution in value resulting from over-head facilities, etc.

43B

Finally, as I mentioned to Christine Keller during the April 18th Work Session in Telluride, I have been informed by a representative of the new owner of the Great American Ranch which covers approximately 10,000 acres on Beaver Mesa, that he may also be interested in undergrounding the approximate 5 miles of the line on his property.

43C

The DEIS and its Summaries are thorough and comprehensive, and you and your staff are to be commended for a job well done.

Sincerely

JGI/tr

cc. Gary Hickox, San Miguel Conservation Foundation Via Fax  
Tom Shiftan, Steve McKnight Specie Mesa HOA Via Fax

---

**43. Letter from John Irwin, dated April 23, 2001.**

- 43A. Comments noted. Utilizing the Stock Drive Road realignment for the underground transmission line and distribution lines would be feasible where slopes and soil/geotechnical conditions are favorable. It should be noted that this type of realignment would most likely require placing the transmission and distribution facilities on either side of the road rather in the road itself. The transmission cables and distribution lines would require a minimum separation of 20 feet. In addition, placement of the facilities within the actual road would most likely not be feasible due to the potential for soil compaction and damage to an underground cable from heavy truck use. However, since the road could be used for construction access and staging, environmental impacts of this suggested realignment would be expected to be less than constructing the underground cable along the existing 69 kV alignment. This suggested modification to the corridor and centerline is incorporated into this FEIS by reference.
- 43B. Comments noted and see response to Comment 39A above.
- 43C. Undergrounding on Beaver Mesa is incorporated as a transmission subalternative in the FEIS, along with the previously evaluated underground sections on Specie, Wilson and Sunshine Mesas.

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**POSTED**

LAW OFFICES  
JOHN G. IRWIN

P.O. BOX 2193  
228 W. COLORADO AVENUE  
TELLURIDE, COLORADO 81435  
TELEPHONE (970) 728-8870  
TELEFAX (970) 728-8711  
\*also admitted in California

44

May 21, 2001

U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, CO. 81423  
Attn: Steve Wells, Project Manager

RE: Nucla-Telluride Transmission Line Project

Dear Steve,

Further to my letter of April 23, I thought it would be a good idea to provide you with an additional copy of my letter to Bobby Bond of February 18, 1998. A copy of Bobby's letter was included with my letter to your office of September 27, 1999, a copy of which is also included herewith.

44A

Sincerely,

JGI/tr

NORWOOD DISTRICT	
MAY 22 2001	
	ADJ. / REC. / FILE
OBJECT RANGES	
TCE	
VEG. MONIT.	
REC. STAFF	
WILDLIFE	
LANDS. MON. STAFF	
SOI ADTECH	
BUS. MONIT. STAFF	
PROMISS CARD	
FILE	

LAW OFFICES

JOHN G. IRWIN

P.O. BOX 2193  
228 W. COLORADO AVENUE  
TELLURIDE, COLORADO\* 81435  
TELEPHONE (970) 728-6670  
TELEFAX (970) 728-6711  
\*also admitted in California

September 27, 1999

USDA Forest Service  
Norwood Ranger District  
P.O. Box 388  
Norwood, CO. 81432

RE: Nucla - Telluride  
Transmission Line Project

Gentlemen,

Thank you for your recent correspondence concerning the Draft Environmental Impact Statement for the above-referenced project and the postcard included therewith which I have completed and return herewith.

Enclosed please find a copy of my letter to Bobby Bond of February 19, 1998 confirming our intention to underground any new facilities across our property on Specie Mesa.

You should know that subsequent to my letter we have in fact placed all 1700 acres of our property under a Conservation Easement with the San Miguel Conservation Foundation as predicted in the letter.

Although I don't claim to be fully informed on all issues, I've recently been advised that the possibility exists for the back-up power requirements to be met by a localized gas-powered generation unit at a lesser cost than the proposed 155kV upgrade and I assume that you will consider that option.

Thank you for your continued attention to this matter.

Sincerely,



JGI/tr  
cc. Bobby Bond Via Fax  
San Miguel County Commissioners By Hand

LAW OFFICES  
JOHN G. IRWIN

P.O. BOX 2193  
226 W. COLORADO AVENUE  
TELLURIDE, COLORADO 81435  
TELEPHONE (970) 728-6670  
TELEFAX (970) 728-4711  
\*also admitted in California

February 18, 1998

Bobby Bond  
Lands Rights Manager  
Tri-State Generation and Transmission, Inc.  
Denver, CO. (303) 254-6007

RE: Upgrade of 69kV Transmission Line  
Nucla to Telluride

Dear Bobby,

Victoria and I thank you for the time that you have spent with us on the phone, on our Specie Mesa property and the two recent meetings in Montrose. We also appreciate the time and attention that Tri-State and others including Sally Edwards have devoted to the concept of relocating the line and you should know that we will make ourselves available to assist in that effort and will attend the two workshops which you've scheduled in Redvale and Telluride on February 24 and 25 of this month.

As you know, we were very concerned with the discussions that we had in Montrose when you indicated that Tri-State is unable to confirm that we will be able to underground a new 115kV transmission line located on our property at our expense.

As Victoria and I have explained to you, prior to the time that we purchased our Specie Mesa property, we were informed by Dave Lancutis of San Miguel Power Association ("SMPA") that: (i) because the existing transmission line is a "secondary line" that it was unlikely that it would be upgraded with larger equipment in the future; (ii) that if the line was upgraded it could be undergrounded; (iii) that his rough estimate of the cost of undergrounding the line on our property was "as much as \$1,000,000"; that amount being the estimated difference between the total cost of undergrounding less the amount that it would cost SMPA to install the new line overhead.

Based on that conversation with Mr. Lancutis (and another gentleman who worked with SMPA who's name we don't recall but would recognize if we heard it) we purchased our Specie Mesa property. We concluded that we could "live" with the existing line and factored into the equation the possibility that we might have to underground the line substantially at our expense if it was upgraded at some time in the future.

LAW OFFICES

JOHN G. IRWIN

Bobby Bond  
February 18, 1998  
Page 2

You've indicated that Tri-State is reluctant to commit to undergrounding a new line for several reasons: The fact that Tri-State does not currently have any underground transmission lines in its system and has no experience in underground lines; the fact that maintaining underground lines may be more difficult than maintaining overhead lines; and the fact that underground lines may require replacement more frequently than overhead lines. Although we appreciate the fact that undergrounding a transmission line may present certain challenges we are hopeful that Tri-State, and all other parties that are involved in the decision-making process in this matter, will recognize the vast benefits that will be achieved both by Victoria and me, and the general public, if a new line is undergrounded.

Victoria and I are convinced that the value of our property will be dramatically reduced if the existing transmission line on our property is replaced with an overhead 115kV line and the much larger structures that are involved in the upgrade. Similarly, our personal enjoyment of owning and occupying the property would be severely compromised.

On a grander scale: You visited our property last summer. As I recall, you were moved by its beauty as Victoria and I were moved when we first saw it. In this day and age it seems that we all need to do whatever is reasonably possible to preserve what's left of the beauty on this planet. We're acutely aware of the fact that San Miguel County must satisfy its requirements, but the interests of property owners who are burdened by the transmission line should be protected in the process wherever possible.

Victoria and I had intended for our family to own our Specie Mesa property in perpetuity and perhaps protect it with a conservation easement. If we part with the property because of the new transmission line, in all likelihood the 15 lots will be developed with houses and we bid adieu to another 1500 pristine acres.

We've been advised by experts in the field that the technology of undergrounding 115kV transmission lines has been greatly enhanced. As you know, I've been in contact with Power Engineers in Hailey, Idaho who contract to underground 115kV transmission lines and who furnished me



44

LAW OFFICES

JOHN G. IRWIN

Bobby Bond  
February 18, 1998  
Page 3

with a form entitled "Telluride 115kV Underground Transmission Line Project - Cable System Evaluation Report - Design Criteria & Parameters" which I forwarded to you in July of last year.

As we discussed, I will contact Power Engineers again for additional information about undergrounding 115kV transmission lines including maintenance, lifespan, etc. and pass it on to you ASAP. You've indicated that you'll give me the specific concerns that Tri-State has about undergrounding.

We look forward to seeing you in Nucla on February 24...let us know if we can be of any assistance prior to that meeting.

Best regards.

Sincerely,



JGI/tr

44. Letter from John Irwin, dated May 21, 2001

44A. Comments noted. Attached letters are included in the Administrative Record.

45

**DOUGLAS R. TUELLER, P.C.**  
 A Colorado Professional Corporation  
 Attorneys & Counselors At Law  
 238 East Colorado Avenue, Suites 1-3  
 P.O. Box 3153  
 Telluride, CO 81435-3153  
 email: weaselesq@telluridecolorado.net

**POSTED**  
 PMR/AD  
 5/31/01

Douglas R. Tueller\*  
 Karen A. Hawkins\*\*  
 \* Also Admitted in California  
 \*\*Also Admitted in Michigan

Telephone:  
 (970) 728-5775  
 Facsimile:  
 (970) 728-5898

May 31, 2001

VIA FACSIMILE (970-327-4854) and U.S. MAIL

Steve Wells, Project Manager  
 U.S. Forest Service  
 Norwood Ranger District Office  
 Post Office Box 388  
 Norwood, CO 81423

Re: Tri-State Generation and Transmission Association, Inc./  
 San Miguel Power Association, Inc. (the "Power Companies")  
 Nucla-Telluride Transmission Line Project (the "Project")  
 Draft Environmental Impact Statement (the "DEIS")  
 Our File Ref: Ptarmigan - Power Lines

NORWOOD DISTRICT	
JUN 04 2001	
	ACCT. INFO. INT.
DISTRICT RANGER	
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VEG. MGMT.	
REC. STAFF	
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CANON. MRL STAFF	✓
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BUL. MGMT. STAFF	
PROMISE CLING	
FILE	

Dear Mr. Wells:

This letter is provided on behalf of the Ptarmigan Ranch Owners Association, Inc. (the "Association"), in our capacity as legal counsel for the Association, with respect to the above-referenced Project and DEIS. Accordingly, in this capacity, we have been instructed to provide the following comments, both on behalf of the Association and its owners:

1. The concerns most prominent for the Association and its members with respect to the Ptarmigan Ranch relate to the severe visual and environmental impacts that the preferred alternative in the DEIS risk imposing on Wilson Mesa and the surrounding high alpine areas.

2. In this connection, obviously, the Association and its members must emphasize concerns regarding the patchwork of legal rights (or lack thereof) currently available to the Power Companies to maintain, let alone expand, the existing powerlines in this area, as well as throughout San Miguel County and possibly other counties. Specifically, as you certainly know, the current powerlines lack any easement rights over private property in a number of areas proposed to be upgraded by the Project. In other areas, the only easements granted are very limited and incapable of being expanded. Indeed, it appears as if the Power Companies have clear rights to pursue the Project only in limited portions of the current preferred alternative areas.

45A

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Steve Wells, Project Manager  
U.S. Forest Service  
May 31, 2001  
Page 2

45

3. As a result, the Association and its members must insist that the true costs involved in pursuing the preferred alternative under the DEIS be expressly and clearly addressed. Specifically, clear analysis needs to be provided explaining the process, plans, timing, and costs involved in obtaining (through purchase, condemnation and/or otherwise) the rights needed to allow the Project to proceed in the preferred alternative locations. Since these will inevitably prove significant (in terms of time involvement and procedural efforts – not to mention costs), it is critical for the DEIS to accurately reflect the unavoidable costs inherent in the preferred alternative, to allow this to be properly compared with the other alternatives.

45B

4. Within this context, the Association and its members desire to reasonably cooperate with the Power Companies to pursue the Project in a manner addressing the best interests of the Telluride and surrounding communities. However, in doing so, the Association and its members are concerned that the Power Companies meet their burdens of minimizing visual, health, safety and environmental impacts, both as addressed in the DEIS and as necessary to meet applicable San Miguel County Land Use Code and related regulations. Specifically, the Association and its members are concerned with ensuring that the obligations to so meet these burdens (including financial obligations) remain on the Power Companies and that this process you are charged with administering does not allow the Power Companies to simply transfer these obligations onto individual landowners.

45C

5. Thus, since the upgrading of the Powerlines, if actually required, will vest a significant benefit to the Power Companies and the Telluride Region as a whole, it is important to ensure that the impacts of these benefits are not borne by only a handful of people, including private property owners on Wilson Mesa. Since such undergrounding of upgraded powerlines appears to be necessary for the Power Companies to comply with the requirements of the San Miguel County Land Use Code (as well as the stringent CC&R restrictions on Ptarmigan Ranch – which are no doubt similar to other private properties impacted), the focus of the DEIS needs to be amended to reflect that this obligation falls on the Power Companies and/or the serviced communities at large, thereby correcting the improper suggestion that such costs should be borne by the landowners actually impacted.

45D

6. In the event that the final community good mandates pursuing the preferred alternative in the DEIS, by expanding power facilities in their general existing locations, the Association and its members believe they can generally support the following:

a. Undergrounding of all powerlines in the Wilson Mesa and surrounding areas, to the greatest extent possible, at the cost and expense of the Power Companies and/or the serviced community at large.

45E

b. Replacing existing powerlines in locations to be constructed underground along existing roadways and/or with other utilities, to the greatest extent possible.

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Steve Wells, Project Manager  
 U.S. Forest Service  
 May 31, 2001  
 Page 3

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c. Cooperating with the Power Companies to help them pursue cost-efficient construction of the Project facilities, underground and otherwise, and to assist the Power Companies in meeting their burdens for complying with San Miguel County and other health, safety, visual and environmental impacts associated with the Project. If reasonably pursued, the Association and its members will seek to do so at little or minimal cost to the Power Companies, other than costs needed to ensure that the Power Companies bear full responsibility for property damage, personal injury liabilities and related matters, as well as all construction, grading, re-landscaping, engineering, maintenance and related costs.

d. Cooperating with the Power Companies to minimize the Power Companies' costs by granting such realigned rights at no cost and/or assisting the Power Companies to avoid the costs and delays that will otherwise be required to obtain and/or condemn needed legal rights (and which matters the DEIS must be amended to reflect). By cooperating in granting the needed easements and related rights of way for the Project facilities, the goal of the Association and its members would be to assist the Power Companies to comply with items a.-c. above. By so doing, this should assist the Power Companies to prove they have adequate legal rights and/or ownership to pursue their needed land use and other approvals, whether at the local, state and/or federal levels.

45E

Thanks for your attention to these matters. We will look forward to your continued efforts in connection with completing the DEIS and allowing the Project to proceed in the public's best interest.

Sincerely,

DOUGLAS R. TUELLER, P.C.,  
 a Colorado Professional Corporation

BY: 

Douglas R. Tueller

DRT:jer

fc:	Art Goodtimes, San Miguel County Commissioner	(970) 728-3718
	Elaine Fischer, San Miguel County Commissioner	(970) 728-3718
	Vern Ebert, San Miguel County Commissioner	(970) 728-3718
	Rob Roberts, for The Association	(303) 782-5371
	Steven J. Zwick, San Miguel County Attorney	(970) 728-3718
	Mike Rozycki, San Miguel County Planning Director	(970) 728-3098

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45. Letter from Douglas R. Tueller

- 45A. Comment noted. It is understood that SMPA's easement rights vary along the existing 69 kV line. *General Response 7* explains how the EIS analysis considered this issue.
- 45B. The scope of the cost analysis conducted for this EIS is based upon the requirements and guidelines for NEPA compliance. *General Response 14* explains the approach that was taken for this analysis. Consideration of some of the costs noted in this comment (e.g. costs of land purchases and condemnation) is beyond the scope of the EIS and would be considered speculative under NEPA. Modifications have been made to the cost information to provide clarification regarding assumptions and to provide a clearer 'apples to apples' comparison for the readers. Reference should be made to the FEIS, Volume I, Summary, Sections 2.2.1.1, 2.2.1.4 and Appendix A-5 for further information.
- 45C. Comments noted. See *General Response 15*.
- 45D. The EIS is an informational document. The purpose of including Tri-State's Policy 113 in the EIS is for disclosure of pertinent information only. Neither the Forest Service nor BLM have any authority for the Project on private lands and have not taken any position regarding this policy. As a funding agency, RUS considers it to be a prudent policy. Consequently, it is not within the scope of this EIS to take any position regarding Tri-State's policy or cost obligations for the Project. Also see *General Response 14* and Response to Comment 41A.
- 45E. Comments noted. See *General Response 14* and Response to Comment 41A.

Sent By: ;

728;

May-31-01 5:03PM;

Page 1/1

46

**The Law Offices of  
Thomas G. Kennedy, P.C.**

238 East Colorado Ave., Suites 4 & 5  
Post Office Box 3081  
Telluride, Colorado 81435-3081

**POSTED**

Thomas G. Kennedy,  
Admitted in Colorado and Maryland

Voice: (970) 728-2424  
Fax: (970) 728-9439  
Email: [tklaw@mll.net](mailto:tklaw@mll.net)

May 31, 2001

VIA FACSIMILE (970)327-4854

Steve Wells, Project Manager  
U.S. Forest Service  
Norwood Ranger District Office  
Post Office Box 388  
Norwood, CO 81423

Re: In-State Generation and Transmission Association, Inc./  
San Miguel Power Association, Inc. (the "Power Companies")  
Nuclea-Telluride Transmission Line Project (the "Project")  
Draft Environmental Impact Statement (the "DEIS")

Dear Steve,

With reference to the above matter, be advised that I represent Rob Stein, the owner of Lot 5 and 6, Ptarmigan Ranch. I have been researching and assisting Doug Tueller who represents the Ptarmigan Ranch Owners Association and the some twenty lot owners in the association. Mr. Tueller has presented his letter which accurately reflects the concerns of my client and I understand is in accordance with the views and concerns of most, if not all of the lot owners in the association. As such, my client wanted to associate his personal and individual views with those expressed by Mr. Tueller.

Mr. Stein was aware of a powerline over his property when he purchased his lots some three years ago. He likewise was aware of covenants placed on the property controlling such things as above ground visual structures (including powerlines) and he was also aware of the very questionable legal status of the Power Companies rights to maintain, let alone increase the intensity of the use and impacts upon my clients property for powerline upgrades.

The upgrading of the Powerlines, if actually required, will vest a significant benefit to the Power Companies and the Telluride Region as a whole, yet the impacts of these benefits will be borne by only a handful of people, including the members of the Association. Any decision reached by the USFS, San Miguel County and any other reviewing agency must take into account these impacts and must allocate the costs of the upgrade first with the Power Companies and, thereafter, any additional costs must be allocated out amongst the Telluride Region.

Please take the recommendations contained in Mr. Tueller's letter to heart and carefully consider them as you complete your review of this proposal.

Very truly yours,

THE LAW OFFICES OF  
THOMAS G. KENNEDY, P.C.

Thomas G. Kennedy

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46A

46. Letter from Thomas G. Kennedy

46A. Comments noted. See *General Responses 14 and 15* and Response to Comment 41A.



**POSTED** 47

**INTERMANAGEMENT, INC.**

Post Office Box 453  
Siasconset, Massachusetts 02564  
Phone: (508) 257-4538 fax: (508) 257-6963

May 8, 2001

NORWOOD DISTRICT	
MAY 14 2001	
	ADCT. INFO. INT.
WELL, HON. I.	
STAFF	
LANDLIFE	
LANDS. MGMT. STAFF	
ENV. ADTECT.	
BUS. MGMT. STAFF	
PROMISE CARD	
FILE	

U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, Colorado 81423

Attn: Steve Wells, Project Manager

Re: Nucla-Telluride Transmission Line Project

Dear Mr. Wells:

I am responding to Garry W. Edson's letter of March 29, 2001, as he asked for comments on the Draft Environmental Impact Statement (Statement).

I represent J C Mesa, which owns 2,200 acres on Specie Mesa. This property has about 1 ½ miles of Tri-State 69 kV transmission lines along its southern boundary. We applaud the work that has been done and note that considerable progress has been made since our conversations with Bobby Bond and Sally Edwards three years ago. We fully endorse the underground transmission line.

On May 20, 1998; I wrote Sally Edwards to express our view that an above ground 115 kV transmission line would have a negative impact on land values of 20% or more. We conclude that the cost of expanding the utility easement would be substantially more than the cost of an underground transmission line.

47A

47

In our 1998 conversations, we expressed the view that the land owners should not have to bear the cost of an underground transmission line. The Statement says that Tri-State wants land owners to bear the cost of the underground transmission line. At \$870,000 a mile, our cost would be about \$1,300,000 which is a major commitment to bury lines. Whether Tri-State pays for the work or J C Mesa pays for the work, it is a cost of capital that neither party wants to bear. From our perspective, we think that Tri-State's interest cost is less than our mortgage interest cost, assuming a bank would consider financing underground transmission lines.

Secondly, we observe that Tri-State is trying to build the entire facility for \$12 million versus building a \$37 million Generation Alternative. Therefore, from our perspective, we think that it is reasonable to ask Tri-State to bear the cost of the 115 kV underground line on the three mesas because Tri-State would still be saving \$12 million.

47A

Thirdly, while the land owner is the direct beneficiary of an under ground facility, the neighboring land owners benefit from not having unsightly transmission lines. This is particularly true on Specie Mesa where John Irwin's 1,700 acres and J C Mesa's 2,200 acres are on the southern section of each property. Therefore, we contend that there is a public good in burying the lines.

Please call me should you wish to discuss this matter further.

Sincerely,



47. Letter from Intermanagement, Inc.

47A. (See General Responses 14 and 15.)

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# THE WOLF LAND CO.

6805 Hwy. 62

Ridgway, Colo. 81432

303-626-5384

POSTED 48

April 9, 2001

Attn: Steve Wells  
U. S. Forest Service  
Norwood District Office  
PO Box 388  
Norwood, CO 81423

NORWOOD DISTRICT	
APR 11 2001	
DISTRICT OFFICE	
ICE	
VED. MOUNTAIN	
REC. STATION	
WILD. SPECIES	
LAND. USE	
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ABiotic RESOURCES	
PLANT. COMMUNITY	
SOIL. COMMUNITY	
WATER RESOURCES	
CLIMATE	
BIOTIC RESOURCES	
ABiotic RESOURCES	

Dear Steve or to whom it may concern:

Regarding the Nucla-Telluride Transmission Line:

Our only concern is across Specie Mesa and although we would prefer it to be underground, this is not important enough for us to be willing to pay the difference of cost at this time.

48A

We would like to stay on the mailing list and be kept informed.

Sincerely,

Wayne E. Wolff  
Ranch Manager

WEW/drh

**48. Letter from Wayne E. Wolff**

48A. Comments noted.

**BENDELOW LAW FIRM, P.C.**

Attorneys at Law

Edward M. Bendelow  
 Stephen B. Johnson  
 Alan M. Keffe  
 Nicole Y. Pieterse  
 Chad M. Wallace  
 Kenneth R. Hope  
 Priscilla S. Fulmer

www.bendelow.net

STEPHEN B. JOHNSON

stevejohnson@bendelow.net

NORWOOD DISTRICT			
MAY 11 2001			
	ACCT	INFO	ENV.
DISTRICT RANGER			
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VEG. MGMT.			
REC. STAFF			
WILDLIFE/CR			
LANDS MGMT.			
SHADETREE			
BUS. MGMT. STAFF			
RECORDS CLERK			
FOX			

**POSTED**

May 10, 2001

Mr. Gary Edson, District Ranger  
 Norwood Ranger District  
 United States Forest Service  
 P.O. Box 388  
 Norwood, Co 81423

Re: Nucla/Telluride Area Proposed 115KV Power Line Upgrade Environmental Impact Statement

Dear Mr. Edson:

This letter is submitted on behalf of Agrivance of Colorado, Inc. ("Agrivance"), which owns property on the eastern rim of Specie Mesa. Mr. Steve Wells and former interim District Ranger, Gordon Sloan previously visited this property (together with the Specie Ridge Holding Company property), to address concerns about a possible power line Alternative X which would cross into Lew Hall Gulch and come closer to if not enter into a portion of the Agrivance Property. I previously corresponded with Mr. Sloan concerning EIS scoping in my letter dated June 30, 1998, a copy of which is attached and incorporated in this comment letter by reference.

Although Agrivance would prefer to see the new power line removed from Specie Mesa and located along the San Miguel River corridor, Agrivance is pleased that the preferred alternative apparently would confine the new power line upgrade to the current 69KV power line corridor, and would not follow the Alternative X alignment. Agrivance continues to be concerned, however, that the analysis corridor (500 yards) remains too wide to permit meaning full site-specific analysis. Agrivance also prefers that any power line upgrade across Specie Mesa be required to be undergrounded. Agrivance disagrees with the conclusion set forth in the EIS that Federal agencies may not require undergrounding to occur at the applicant's cost as a condition of approval.

49A

We thank you for this opportunity to comment on the draft EIS.

1120 Lincoln Street  
 Suite 1000  
 Denver, CO 80203  
 (303) 837-9600  
 Fax (303) 860-0311

101 E. Colorado Ave., #201A  
 P. O. Box 726  
 Telluride, CO 81435  
 (970) 728-4300  
 Fax (970) 728-5955

1120 South Lincoln St., #203  
 P. O. Box 773630  
 Steamboat Springs, CO 80477  
 (970) 879-5543  
 Fax (970) 871-9322

**BENDELOW LAW FIRM, P.C.**

Attorneys at Law

Mr. Gary Edson  
May 10, 2001  
Page 2

Very truly yours,

BENDELOW LAW FIRM, P.C.



Stephen B. Johnson

SBJ/bw

Enclosure

C: Jim Phelan

s:\agrivance\letters\05-10-01 ltr to Gary Edson re EIS



June 30, 1998

Via telefax # 970/327-4854

and

U.S. Mail

Mr. Gordon Sloane,  
Interim District Ranger  
United States Forest Service  
Norwood Ranger District  
P.O. Box 388  
Norwood, CO 81423

Re:           **Nucla/Telluride Area Proposed 115 kV Powerline Upgrade - Scoping Comment**

Dear Mr. Sloane:

We represent Agri-Vance of Colorado, Inc. and Specie Ridge Holding Company, Inc., who separately own property on the eastern rim of Specie Mesa. This letter pertains to the environmental studies being conducted in connection with construction of an electric power transmission line upgrade in that area and, more specifically, environmental scoping required for the USFS special use permit for the power line. We submit the following comments on our clients' behalf:

1. The special-use permit ("SUP") application submitted by Tri-State Generation and Transmission Association (the "Applicant" or "Tri-State") is wholly inadequate for purposes of ascertaining the impacts of the project at issue. The application is incomplete and fails to describe the length, possible locations, or dimensions of the proposed transmission line and the various alternative alignments under consideration, as well as the USFS land which may possibly be impacted. No map, which is mandatory, was attached to the application. The applicant states in paragraph 10a that the "alternatives will be developed during the environmental analysis process". If this statement refers to alternative alignments and/or types of transmission lines, then it is incumbent upon the applicant to generally identify and describe such alternatives, as part of the initial application. Paragraph 13 of the application requires the Applicant to describe the likely environmental effects that the proposed use will have on air quality, visual impact, surface and ground water, changes to streams or water bodies, noise levels, land surface, including vegetation, soil and soil stability, populations of fish, plant and wildlife. Applicant merely states in response that "these effects will be fully disclosed in the environmental document". Possible future compliance subverts both the spirit and the letter of the SUP and National Environmental Policy Act ("NEPA") review processes, as demonstrated below.

2. Applicant has provided no supporting information for its application. 36 CFR 251.54(e)(4), concerning SUP application content, states that "A project description, including map(s), shall be required in sufficient detail to enable the authorized officer to determine: the feasibility of the project..., its impacts on the environment, any benefits provided to the public, the safety of the proposal, the lands to be occupied or used, the terms and conditions to be included, and whether the proposal will comply with applicable laws, regulations, and orders". 36 CFR 251.54(e)(6) further requires the submittal of an environmental protection plan "for the protection and rehabilitation of the environment during construction, operation, maintenance and termination of the project...". Applicant refers in paragraph 14 to its "extensive list of mitigation measures" to be applied to the project, but fails to identify this list or make it available to the public through the SUP application. The application therefor fails to conform to the SUP requirements set forth in 36 CFR 251.54 (e).
3. These deficiencies mean that it is not possible for your agency to properly scope the environmental analysis to be performed. More importantly, the public is not adequately informed at this time as to the nature of the project. Numerous potentially-impacted property owners have never been contacted by the USFS agency representatives. "Existing" maps requested by me from Ms. Edwards were received over forty-five days following my request. In the meantime, public open houses were being held and public opinion was being formed. The alignment maps have been modified on several occasions without sufficient input from all property owners on Specie Mesa. Grace Herndon's article in the Daily Planet documents some of the notice deficiencies. The potential visual impacts and property trespass which may result have not been fully understood or appreciated by the public because the alignments have been a moving target. (For example, the "X" and "Y" alternatives on the undated map we received on 5-8-98 newly showed proximity to the Specie Mesa Access road (located east of County Road P52), and would trespass across a portion of the Agri-Vance property, respectively. This Y alternative would cross near a prime residential building site on such property (which the owner intends to use for personal residence construction), and would drastically impact scenic views from the Specie-Ridge property.) As a result, the public participation process to date has failed to elicit the a full, let alone informed, response to the proposal, and it is therefor impossible for the USFS to accurately gauge the extent of public controversy over the proposal for the purpose of informing the decision as to the appropriate environmental analysis (Environmental Assessment or Environmental Impact Statement).
4. The above-comments also apply to the role of the Rural Utility Service in scoping the environmental studies. A copy of the memorandum of understanding between the USFS, RUS, and applicant was requested of Ms. Edwards via telefax from my office on 4-30-98. Neither the draft nor the executed version of such memorandum was ever provided to me, and I reserve the right to extend my comments specifically to the RUS following receipt. I now ask your office to forward this document directly to me.

5. As to the environmental document, the proposed alternative alignments have been justified by the applicant as resulting from a desire, in part, to avoid upgrading the powerline in portions of its current location with higher population densities in the Redvale and Norwood areas. The rationale for such a desire has not been expressed and should be specifically addressed in the study. If such avoidance is indeed a benefit, then any new impacts to other rural areas or new corridors must also be described and analyzed as costs.
6. The Applicant has also expressed a general desire to minimize scenic impacts, yet is proposing the new X alternative across Specie Mesa, which itself has unsurpassed scenic qualities. The scenic impact analysis should reflect the new impacts not only from public highways, but also from private roads and properties like my clients' which have outstanding scenic qualities.
7. The environmental study should also precisely define the possible alternative alignments corridors. Five hundred yard wide corridors are too broad for precise analysis of property trespass potential. The USFS permit decision must take into account that approval of certain corridors will inevitably cause certain properties to be trespassed upon. Properties which may be trespassed upon must be individually identified, in order to accurately assess probable project costs. Environmental impacts cannot be properly described, let alone analyzed, with such broad corridors. Steep slopes which characterize the eastern rim of Specie Mesa mean that broad corridors could have huge vertical variation between either edge, with widely-varying riparian, vegetative, and erosive potential characteristics. We suggest that one-hundred yard wide corridors be the minimum study width.
8. The utilization of existing corridors should be considered the primary, preferred alternative. Existing impacts, disturbance, access roads, etc., should be documented as the baseline against which additional impacts of expanded use should be measured. The possibility that up to twenty miles of new powerline corridor will be created must be fully assessed; the least damaging alternative must be identified based on length of disturbance and new impacts created.
9. On Specie Mesa, my clients and most landowners located to the south of the "X" alternative prefer that the existing corridor to the north be used. This means that an option should be added to extend the "V" alternative northward from its intersection with the "W" alignment, up to the existing "BB" corridor.
10. My clients both are wildlife aficionados and bought their properties in part for their wildlife values. Elk populations are particularly strong on Specie Mesa and on my clients' properties. Wildlife disturbance from new powerline corridors, particularly along the eastern Specie Mesa Rim and within Lew Hall Gulch, both calving areas, should be avoided if possible. Additional public access which may be created by upgraded or new corridors, and the human and wildlife impacts of such access, must be addressed as an impact and avoided or mitigated if possible.



11. Mr. John Irwin has actively proposed the undergrounding of the powerline across his property on Specie Mesa and possibly over the adjoining Corzine property to the east, with additional costs to be privately paid. My clients are fully supportive of this option, and believe that despite the Applicant's stated reluctance to consider this option, it should be fully explored for Specie Mesa and possibly other areas. That means the environmental study should address the possibility, technical feasibility, and cost of this option, and should assess the obvious visual impact, raptor, and other wildlife benefits of this idea, as well as preservation of property values.
12. There is an historic stock drive which crosses Specie Mesa, adjacent to if not within the "X" alternative. While portions are in disrepair, it is still actively used by local ranchers and grazing lessees, including my clients' lessee. This and other local historical features, whether or not designated, should be identified and completely avoided if possible.

I thank you for the opportunity to submit these comments. My clients fully intend to enforce, when and if necessary, all substantive and procedural safeguards in NEPA and related authorities in order to ensure that the decision-making process is properly completed, and that their properties are protected in the process. I look forward to your responsive guidance to the Applicant and further constructive dialogue on this matter.

Very truly yours,

BENDELOW & DARLING, P.C.

Stephen B. Johnson

c: Christoph. Henkel  
Jim Phelan  
Sally Edwards  
John Irwin



**49. Letter from Stephen Johnson, Bendelow Law Firm**

49A. (See General Responses 14, 15 and 16.) The evaluation of corridors, rather than specific rights-of-ways, is typically used in NEPA compliance documents for high voltage transmission lines. Corridor evaluations provide a framework for identifying sensitive resources, determining the range of impacts that could occur and their significance, and documenting the measures that can be used to avoid or minimize impacts to the extent possible. Corridor widths provide the siting flexibility necessary to avoid and minimize impacts during final design and engineering. The final right-of-way and pole locations would be determined in consultation with county landowners and the permitting federal, state and local agencies. EIS Volume I, Section 3.1 sets forth the approach used to disclose the range of impacts that could occur within the 0.5-mile-wide corridors.

It should be noted that, while Alignment X was eliminated early on in the NEPA process as an overhead transmission line alternative, it has been suggested by Mr. John Irwin (comment letter 43) as a possible route for undergrounding the line across Specie Mesa. Undergrounding the line adjacent to the Stock Drive Road has been incorporated in the FEIS as a potential mitigation measure for minimizing physical ground disturbances during construction. This measure may be considered by San Miguel County as part of Tri-State's Special Use Permitting Process.

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POSTED

05/22/2001

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U.S. FOREST SERVICE  
 NORWOOD RANGER DISTRICT OFFICE  
 P.O. Box 388  
 NORWOOD, CO. 81923  
 ATT. STEVE WELLS.

NORWOOD DISTRICT	
MAY 24 2001	
	ACCT INFO UNIT
DISTRICT MANAGER	
FOE	
VEG. MGMT.	
REC. STAFF	
WILDLIFE	
LAND MGMT. STAFF	
WILDLIFE STAFF	
VEG. MGMT. STAFF	
PROMOTE CARD	
FILE	

DEAR SIR:

I AM WRITING ON BEHALF OF THE SCHMID FAMILY RANCH. AS YOU MAY HAVE HEARD THE SCHMID FAMILY HAVE PUT A CONSERVATION EASEMENT ON OUR RANCH TO TRY TO PROTECT THE OPEN SPACE IN THE WILSON MESA AREA. WE HAVE BEEN IN THIS AREA FOR 119 YEARS AND HAVE SEEN MANY CHANGES. ONE OF THE BIGGEST CHANGES IS THE UNDERGROUNDING OF THE LINE'S THROUGH OUR RANCH AND SURROUNDING PRAIRIAN SUBDIVISION.

I WOULD LIKE TO SEE THE NEW 115 KV LINE PUT OUT OF SIGHT NOW AND FOREVER. THE LAND IN THIS AREA IS SELLING FOR 25,000 TO 30,000 / AC.

I THINK YOU SHOULD APPLY THE COST OF ADDITIONAL RIGHT-OF-WAY TO THE COST OF UNDERGROUNDING THE 115 KV TRANSMISSION LINE. I THINK THAT TRI-STATE SHOULD TAKE A MORE REALISTIC VIEW OF PAYING ALL OR AT LEAST SOME OF THE COST.

THANK YOU

*Mary E. Schmid*

MARY E. SCHMID

MANAGER OF SCHMID FAMILY RANCH LLC

50A

50. Letter from Marvin E. Schmid

50A. Comments noted. See *General Responses 14 and 15* and Response to Comment 41A.



POSTED

51

NORWOOD DISTRICT			
MAY 16 2001			
CONTRACT NUMBER	LOCAL	WFO	WNT
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VED. MOUNT.			
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WILDLIFE			
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SW. DISTRICT			
BLK. MOUNT. STAFF			
PROJECT PLAN			
FILE			

May 12, 2001

U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood Colorado 81423  
Attn: Steve Wells, Project Manager

Dear Mr. Wells,

We would like to take a moment to address our concerns about the Nucla-Telluride transmission line.

We are all fully aware of the necessity of providing power to homes both here and across the United States. It would be sadly remiss on the part of the caretakers of our nations most amazing natural resources to even consider transmission lines 80 feet tall.

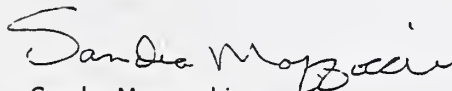
Just for a moment, if you will, imagine post cards, pictures and scenic views of Wilson Peak, which is the most photographed mountain in the entire United States, with 80-foot high voltage power transmission lines in the foreground... Is this the type of legacy that we choose for our children and their children? How can we agree to such a travesty?

While it may be Tri-State Transmission's usual and normal policy to move power in this manner and while we fully agree upon the need for such power, any other means than under grounding these transmission lines would appear responsibly bereft.

The entire San Juan region can not support this type of decision making. We rely upon the Forest Service as custodians of our great natural resources and require that Tri-State underground this entire transmission cable.

I am sure that they will be able to pass on the additional construction costs (large companies have a way of being able to do this), so that all concerned will not suffer hardship and the future of the San Juans will remain uncompromised.

Thank you  
Sincerely,



Sandra Mazzocchi  
President Wilson Mesa Ranch Homeowners Board

51A

51. Letter from Sandra Mazzocchi

51A. Comments noted. See *General Responses 14 and 15* and Response to Comment 41A.

Gary D. Jones  
1063 Country Club Circle  
Birmingham, AL 35244  
Tele: 205/987-5401

NORWOOD DISTRICT 52			
MAY 30 2001			
	ADCT.	INFO.	INT.
DISTRICT RANGER			
TCE			
VEG. MGMT.			
REC. STAFF			
WILDLIFE			
LAND MGMT.			
PRO. AD. CH.			
PLS. MGMT. STAFF			
PROJECT CH.			
FILE			

May 29, 2001

U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, CO 81423

Attention: Steve Wells, Project Manager

Subject: San Miguel Power Company  
Nuclear Transmission Line

POSTED

Dear Mr. Wells:

I am writing this letter to strongly object to the proposed power line project which would result in building an 80-ft high transmission line across Wilson Mesa. This would result in terrible abuse of one of our greatest resources—the natural beauty of the area.

Our Homeowner's Association has established architectural restrictions to limit the height of our residences above the skyline to preserve our current natural beauty. An 80-ft high transmission line would create an industrial environment and destroy the basic purpose of our owning property on Wilson Mesa which is to enjoy its natural beauty. Should San Miguel Power Company have the ability to destroy dreams and property values of private homeowners through the construction of this overhead power line? I hope that you can support us in preserving the beauty of Wilson Mesa.

52A

Regards,



Gary Jones

GJ/rd

pc: Sandra Mazzocchi

52. Letter from Gary Jones

52A Comments noted. See *General Responses 14 and 15* and Response to Comment 41A.



POSTED

53

Drs. Lawaczeck, McKinnon, Feagin &amp; Carter P.C.

Brookwood Eye Institute  
Suite 501  
513 Brookwood Boulevard  
Birmingham, Alabama 35209  
205-877-2940

Elmar Lawaczeck, M. D.  
Thomas D. McKinnon, M. D.  
R. Wyatt Feagin, II, M. D.  
Britton B. Carter, M. D.

Fax 205-877-2933

May 22, 2001

U.S. Forest Service  
Norwood Ranger District Office  
PO Box 388  
Norwood, Colorado 81423  
Attn: Steve Wells, Project Manager

RE: Telluride Transmission Line

This letter is to protest the plan to change the present power line to one on poles over 80 feet tall which seems almost sacrilegious. The view of Wilson peak across Wilson Mesa is one of the most spectacular sights in the United States. It is somewhat beyond belief that anybody would even contemplate such a travesty.

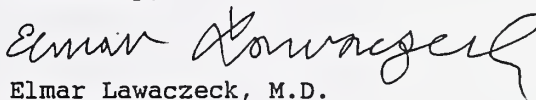
The alternative of placing the line underground and charge the land owners who have to contend with the construction and disturbance of their land with the cost is an equal absurdity.

In my perception, the line, if it has to be placed across Wilson Mesa, should be placed underground and the burden of this cost should be borne by the Power Company.

53A

NORWOOD DISTRICT			
MAY 29 2001			
ADMIT	INFO	INT.	
DISTRICT			
ICE			
MED. BUREAU			
MED. STAFF			
WILSON PEAK			
WILSON MESA	✓		SW
WILSON MOUNTAIN			
WILSON CANYON			
WILSON RIVER			
WILSON LAKE			
WILSON CREEK			
WILSON SPRING			
WILSON FALLS			
WILSON CLOVER			
WILSON PINE			

Sincerely,



Elmar Lawaczeck, M.D.

53. Letter from Dr. Elmar Lawaczeck

53A. Comments noted. See *General Responses 14 and 15* and Response to Comment 41A.

54

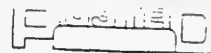
lic. iur. Pius Huber  
Rechtsanwalt



in Kooperation: Dr. Ursula Schefer  
Treuhanderin mit eidg. Fachausweis

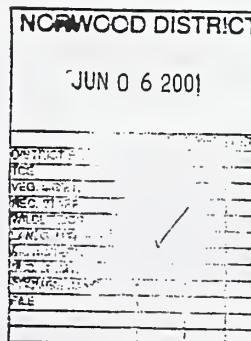
U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, CO 81423  
Attn: Steve Wells, Project Manager  
Fax 001 970 -3274854

Huber & Partner  
Rechtsanwälte



Partnerbüro des CPS Schliessmann  
International Lawyers Network

Weisses Schloss  
General Guisan Quai 36 Baarerstr. 34  
CH-8002 Zürich CH-6300 Zug  
Fon: +41-1-208 21 11 Fon: +41-41-710 26 02  
Fax: +41-1-208 21 12 Fax: +41-41-710 26 07  
<http://www.int-lawfirm.ch>  
email: p.huber@int-lawfirm.ch; u.schefer@int-lawfirm.ch



26th Mai 2001

High Voltage Power Line across Wilson Mesa and other Mes's in the San  
Juans, Colorado

Dear Mr. Wells

Enclosed you receive our opinion concerning the mention Voltage Power  
Line.

Yours Sincerely

Huber

CPS SCHLISSMANN INTERNATIONAL LAWYERS NETWORK

Partnerbüro Bad Homburg  
PD Dr. Christoph Ph. Schliessmann, Rechtsanwalt  
Anika M. Heise, Rechtsanwältin  
Andreas Becker, Rechtsanwalt  
Dipl. Ök. Udo Fährn, Wirtschaftsprüfer, Steuerberater

Partnerbüro Bozen  
Dr. Andreas Stacul, Adv.-Rechtsanwalt  
Dr. Maurizio Vezzali, Adv.-Rechtsanwalt

Partnerbüro London  
Geoffrey Dodd, solicitor  
James Stott, solicitor

Partnerbüro München  
Dr. Jürgen Flasnöcker, Rechtsanwalt  
Dr. Hans-Werner Hürholz, Rechtsanwalt  
Dr. Bernhard Wimmer, Rechtsanwalt

Partnerbüro Nürnberg  
Christian H. Glöckner, Rechtsanwalt

Partnerbüro Salzburg  
Dr. Franz Hitzendichler, Rechtsanwalt  
Mag. Ludwig Vogl, Rechtsanwalt

Partnerbüro Stuttgart  
Dr. Andreas Fandrich, Rechtsanwalt  
Paul-Titus Hammerbacher, Rechtsanwalt

Partnerbüro Düsseldorf  
Dr. Heinrich E. Glöckner, Rechtsanwalt

US Forest Service  
Norwood Ranger District Office  
P.O.Box 388  
Norwood, CO 81423  
Attn.: Steve Wells, Project Manager

**Re.: High Voltage Power Line across Wilson Mesa and other Mesa's in the San Juans, Colorado.**

Zürich, 26<sup>th</sup> May 2001

Dear Mr. Wells,

Representing the owners of Lot #71 on Wilson Mesa and as a member of the Wilson Mesa Homeowners Association I have to express my strongest concern and officially express my protest against the construction of a new High Voltage Powerline across Wilson Mesa as well as across the other surrounding Mesa's.

Our fear and our protest is twofold:

On the one hand the proposed Power Line is a disturbance and dangerous for the unique Mesa environment. This is based on scientific research which has shown that the magnetic fields and electronic smog emitted by high voltage power lines have a huge damaging effect on both flora and fauna.

Aerial pictures of high voltage power lines and the surrounding vegetation show a 20% - 40% decrease in vegetation growth rates over periods as short as 5 years. This is particularly visible when the tree heights are compared of trees planted at the same time. Those underneath and within 400m of the cables are shorter and sicker than those further away.

Migratory birds navigate using the earth's magnetic fields. Flocks of birds loose their ways when crossing such lines. It has also been proven that deer will not breed in the vicinity of a power line even if that area has been their breeding grounds for centuries.

If we are deaf to the signs given to us by the effects of such power cables on our wildlife, we should at least consider the impact on humans. Research in Europe has proven a link between the high rates of cancer in households living underneath or close to such high voltage power lines and the power cables themselves. Cancer is not the only medical problem associated with power lines. Victims also suffer from migraines, insomnia and chronic fatigue syndrome. Not surprisingly the value of properties close to such electrical installations have dropped dramatically as a result.

54A

54B

54C



54

The second concern shared by all Wilson Mesa Homeowners Association is of course the negative effect that these unsightly and dangerous power lines will have on the value of our land. I use the word "value" in two senses:

On the first hand all Wilson Mesa home and landowners share a love of this remote uniquely beautiful location. We self-regulate the aesthetics of any proposed building work and work together to ensure that this special area is protected from refuse. Home and land owners come from not only all over the United States but also from all over the world. Among our residents we have people from Texas, California, Georgia, New York and like myself from Europe. We love the Wilson Mesa area as it enables us to escape civilisation and to enjoy the pure, unadulterated nature that is the Wilson Mesa and all surrounding Mesas.

On the second hand the value of the Wilson Mesa area is also a financial one. The construction of the proposed new power line will halve the value of our land. Even if the line does not run through our property, just being able to see the line will adversely affect property and land value.

At present none of the Homeowners want to sell their land but if plans to build this power line go ahead our very reason to be here will be destroyed. As opposed to land in urban surroundings it is the very wilderness and remoteness of the Wilson Mesa which makes this area so special. It is an area that deserves to be protected and maintained for all future generations.

We would like to ask you to run the power line on alternative route if it really has to be built at all. A viable route would be along a highway or road as this may not effect wildlife as much because this habitat is disturbed already by the roads. We would also be happy to consider the running of such lines underneath ground level providing that the insulation emitted no magnetic interference. However if these lines are run underground this must be for all of the Mesa areas and not just the Wilson Mesa as even seeing these power cables from a long distance is an eyesore.

We understand that there may be needs of other people (like the inhabitants of Telluride) who have a right to be supplied with enough electrical power to consider. We are simply asking you to consider the many other possibilities that we know from the engineers are available in running power to Telluride. If this proposed route is purely for economic reasons of the Power Company – this cannot be a reason to destroy a piece of the country like this. Nobody would ever consider running a High Voltage Power Line across the Grand Canyon, and this not just because it is a Protected Area but because the optical appearance would be destroyed for ever.

The threat does not only harm the Home and Land Owners of this area. There are many other people who come to the Mesas areas for rest and recuperation. For example the "Many Ponies" horse back riding farm makes people come up to the Mesa and the non-profit social organisation "Faraway Ranch Foundation" helps handicapped children and others by bringing them in contact with nature. The whole tourist industry of the Telluride area would also be adversely affected as Wilson and the other Mesa's have always been looked at as a special place and worth a hike when visiting Telluride.

On a personal note as commerical film producers the co-owners of our lot have been privileged in having shot films all around the world over the past 28 years. No location in their experience comes close to rivalling the beauty and purity of the Mesa area, an opinion which I know is shared by many others in the film industry who come here purely because of the 360 degree perfect views that the Mesa affords. As a result just to be able to see a power line anywhere across the Mesa will destroy it's unique beauty.

54D

54E

54F

54

There are not many places like this left in the world. Please help us to conserve this for the generations to come. Please do not allow a power line across Wilson Mesa and the other surrounding Mesas.

54F

With many thanks in advance for your careful consideration of the negative impact that such a project would have on our mutual rural heritage.

Yours sincerely

Pius Huber  
Attorney at Law

#### 54. Letter from Pius Huber

##### 54A. *Issue:* Magnetic fields and electric smog will affect vegetation along the right-of-way.

There is no evidence that magnetic fields from high voltage electric power lines will affect vegetation. Purdue University and others conducted several studies of this many years ago and found no such evidence that magnetic fields cause harm to vegetation.

Electric fields can cause harm to trees that grow very close to power lines (within a few feet) so that their leaves or needles are exposed to very high electric fields. This exposure can cause a leaf or needle tip burn on the leaves or needles closest to the power line but the effect diminishes when the vegetation is more than a few feet away. Even if a tree has leaf tip burn on this leaves or needles closest to the power line, the remainder of the tree experiences no damage.

The comment also goes on to say that aerial photographs of transmission line rights-of-way show a decrease in vegetation along the right-of-way. This is true. Trees along the right of way are either cleared or trimmed to prevent them from coming close to the conductors. This is to prevent the trees from either growing or falling into contact with the power line and shorting it out. The retardation of tree growth is accomplished by manually trimming the trees. Thus they will indeed be shorter than trees growing away from the power line as the comment suggests.

##### 54B. *Issue:* Transmission power line magnetic fields will affect the navigation of birds and breeding of deer

There is no evidence that magnetic fields from the line will affect the navigation of birds. If as the commentator says, "flocks of birds lose their ways when crossing such lines" given the thousands of miles of transmission lines in this country, this alleged phenomenon should be obvious all across the country. Such is not seen.

The breeding habits of deer also have not been seen to be affected by transmission lines. Indeed wildlife researchers have said the transmission line corridors are actually preferred in heavily forested areas that provide an opening in the forest where forage for wildlife will grow and the deer can graze. If their breeding was affected, the deer population along a transmission line would go down and the wildlife experts would not permit an open transmission line corridor as they currently do.

##### 54C. *Issue:* Transmission line magnetic fields have been proven (in Europe) to be cancer risks to humans. Magnetic fields also cause migraines, insomnia and chronic fatigue syndrome.

A great number of scientific studies have been conducted around the world on this subject. While it is true that small statistical associations have been seen in some studies between people living near power lines and the occurrence of childhood leukemia, this does not constitute proof of a causal link between the two. The most recent European review of the scientific literature on this subject was conducted in the UK by a team of scientists led by Sir Richard Doll. They concluded in a Reuters news story in March 2001 "There is evidence, albeit not statistically that clear, of a slightly elevated risk of childhood leukemia in association with very high mains power fields at levels that are not usual in Britain," Colin Blakemore, a professor at Oxford University, told journalists before publication of the report." "Blakemore said



the risk was so low that it was unlikely to pose any real danger to British children." Dr. Blakemore was a member of the UK study team.

Earlier reviews in the US in 1999 by the National Academy of Sciences (NAS) and the National Institutes of Environmental Health Sciences (NIEHS) found much the same result. The NAS concluded in their report to Congress "The results of the EMF-RAPID Program do not support the contention that the use of electricity poses a major unrecognized health danger." They go on to say, "The committee recommends that no further special research program focused on possible health effects of power-frequency magnetic fields be funded." The NIEHS concluded, "The scientific evidence that ELF-EMF exposures pose any real health risk is weak." These conclusions would indicate that the concerns of the commentator have been looked at by many reputable scientific organizations and have been largely discounted. None of the scientific reviews found a relationship between magnetic fields exposure and other human health implications including migraines, insomnia and chronic fatigue syndrome as the commentator suggests.

54D. Comments noted. No response necessary.

54E. During scoping, a number of alternatives to portions of the Norwood-Sunshine Route were suggested by the public and considered. Alternatives considered early on and the reasons for their elimination are discussed in EIS Chapter 2.0, Section 2.3, and shown in EIS Volume II, *Plate PROJECT-9*. No alternative routes were suggested to the crossing of Wilson Mesa during scoping, except along the San Miguel River. In response to comments regarding a route along the San Miguel River, see FEIS Section 2.3

The EIS evaluates, at an equal level of detail, however, the Norwood-Telluride Alternative that is routed partially along the San Miguel River Canyon and the south side of SR 145. Based on the EIS analysis, this alternative has been determined to result in greater impacts to both the natural and human environment than the Norwood-Sunshine Alternative. Although this alternative would be along SR 145 for part of its distance, the line would also have to be routed adjacent to the San Miguel River Corridor that is sensitive both biologically and visually. This corridor contains very steep slopes that both limit feasible locations for a powerline and pose significant geotechnical and soil constraints. The sensitivity of the alternative corridor is also due to the status of SR 145 as part of the San Juan Skyway National Scenic Byway. Visual and biological effects would also be greater for this alternative since mature conifers and aspens would need to be removed from the right-of-way for electrical clearance purposes. Reference should be made to FEIS Chapter 3.0 for full disclosure of the potential effects of this alternative.

54F. Comments noted. No response required.



POSTED 55



Ken Rabb  
<kenrabb@mail.canac  
ad.ac.jp>

To: "steve wells" <swells@fs.fed.us>  
cc:  
Subject: Power Lines -- Wilson Mesa

05/30/01 02:07 AM

Dear Mr. Wells,

Hello! Greetings from Japan. Recently, we received a letter informing us of 80 foot high voltage lines under consideration for construction across the mesa. My apologies for the informality of this email response in lieu of a more personal letter. My family and I reside in Japan for most of the year and spend summers and the winter holiday in Telluride. If I had chose to post a letter its arrival would be after the deadline, the 31st of May.

Certainly, the need for upgrading the power in the San Miguel area is an argument which needs to be addressed. It is important we consider issues before they become problems. However, the visual environmental concern residents of the Wilson Mesa area express is equally as important. I am sure you would confer this is an area of America that is breathtaking. As a recent homeowner, I had alternatives where to purchase and build our dream home. After considering a host of issues, I selected Wilson Mesa mainly because of its beautiful vistas. The proposed power line upgrades would definitely have a negative visual environmental impact on the area.

The solution is not an easy one. The residents of the mesa are a minority when compared to the general populace the power lines would serve. However, a society can be judged on how it treats its minority. Therefore, I propose that the company investigate alternatives. Possibly following the lead of other communities, placing the lines underground would be a viable alternative at their expense.

Thank you for your time. I am certain as a final solution, you will decide upon a means that addresses all parties concerns.

Sincerely,

Kenneth B. Rabb

*Forwarded email  
to VPW 5/30/01  
SW*

55A

55. Letter from Kenneth B. Rabb

55A. Comments noted. No response required.

56



"Nikolaus  
Pfusterschmid"  
<nikimailbox@aon.at  
>

To: <swells@fs.fed.us>  
cc:  
Subject: Power line upgrade on Wilson Mesa

05/27/01 03:51 AM

*Forwarded  
to UPW  
via email  
5/29/01  
SW*

**POSTED**

Nikolaus and Regine Pfusterschmid  
1183 Wilson Mesa Ranch Circle  
Telluride, Co. (P.O.Box 293 Placerville Co. 81430)

To U.S.Forest Service  
Norwood Ranger District Office  
Attn. Steve Wells, Project Manager

Dear Mr. Wells,

We are landowners on Wilson Mesa (Lots 44,45,46,47) and have just heard about outrageous plans of SMPC to cross Wilson Mesa with power lines above ground on 80 ft tall poles. It is inconceivable, that in the year 2001 our beautiful scenery should be destroyed with 18th/19th century "Wild West technology". Power lines must be run underground at the expense of the company without harm to Wilson Mesa and the adjacent areas.

56A

Best regards  
Nikolaus and Regine Pfusterschmid

56. Letter from Nikolaus and Regine Pfusferschmid

56A. Comments noted. See *General Responses 14 and 15* and Response to Comment 41A.



57

POSTED



AugustusVaughn@aol.  
com

To: swells@fs.fed.us  
cc:

05/29/01 04:23 PM

Subject: Nucla-Telluride Transmission Line Project

Dear Mr. Wells,

My wife and I are landowners at Wilson Mesa Ranch (tract 91). I would like to briefly register our strong opposition to Tri-State's proposed action of rebuilding the existing 69 kv transmission line (which is already a scenic detriment) between the Nucla and Sunshine substations. Although the "purpose and need" of this project are clear and not in question, the means of achieving this project are. Tri-State has proposed to utilize 115 Kv above ground lines along the existing route, per their usual protocol. They obviously have no respect for the private land owner or the unspoiled beauty of the San Juans. This attitude is unequivocally wrong. Tri-State should adopt the environmentally preferred alternative set forth in the ENVIRONMENTAL IMPACT STATEMENT and judiciously underground (at their expense) segments of the transmission line across portions of Specie, Wilson, and Sunshine Mesas. At some point, our diminishing natural resources and unspoiled wilderness must stop taking "the back seat" at the expense of big business and the almighty dollar.

57A

Sincerely,

Augustus and

Rebecca Vaughn

forwarded  
via email to VPN  
5/29/01 SW

57. Letter from Augustus and Rebecca Vaughn

57A. Comments noted. See *General Responses 14 and 15* and Response to Comment 41A.

58

Amy Conger & Bob Herschler  
P.O. 3230, Telluride, CO 81435 Ph/Fax 970.728.4358  
Email: aandb@rmi.net

NORWOOD DISTRICT	
MAY 24 2001	
	ADJ. INFO. INIT.
DISTRICT RANGER	
ICE	
VEG. MGMT.	
REC. STAFF	
WILDLIFE	
LANDS, MGMT. STAFF	
SOI ADJ. STAFF	
BUG. MGMT. STAFF	
PROMISE CARRY	
FILE	

May 19, 2001

POSTED

Steve Wells, Project Manager  
U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, CO 81423  
Fax: 1.970.327.4854

Dear Steve Wells and the Forest Service,

As homeowners on Wilson Mesa Ranch we are deeply concerned – in fact, alarmed – at the Tri-State Power Company's proposal to build highly intrusive power lines on our Mesa.

Should we describe to our friends the exquisite beauty of the mountain landscape in SW Colorado by saying: "Sitting at our breakfast table we can see three 14,000 foot mountains and half a dozen 80 foot power lines a quarter of a mile away." No thank you.

We believe that alternatives might be considered, perhaps running lines down the river valley where they would not be on top of the world and would be less visible. We have been led to understand they already have an easement there.

Has consuming less energy been considered as a real viable alternative?

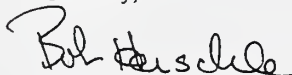
Why are people sure that this backup energy is necessary? Who came up with the figures? Was any conflict of interest involved? The fact is that it will not be a life threatening emergency to anyone if the ski lifts don't work for a day.

People come to the mountains to get away from power lines, to appreciate the pristine beauty that man has not yet fouled up. As the hymn states: *Where every prospect pleases and only man is vile.*

If Tri-State Power gets permission to put power lines across any Mesa, those who plan to profit from selling the power should also pay for putting them underground.

We appreciate the work the Forest Service has put into the Reports. We hope that you will personally reply to the questions we are asking.

Sincerely,



Bob Herschler



Amy Conger

58A

58B

58. Letter from Amy Conger and Bob Herschler

- 58A. Comments noted. See response to Comment 54E and FEIS, Section 2.3 regarding alternative routes along SR 145. Energy conservation has been considered in the DEIS in Section 2.3. While conservation is encouraged as part of the area's energy plan, the implementation of conservation measures, in conjunction with the 13 MW of power available from the existing Nucla-Sunshine 69 kV line, is not sufficient to meet the long-term winter peak demands in the Telluride Area. In addition, Tri-State has requested this project for regional load serving and bulk power transfer needs as well, which would not be met by energy conservation measures. See Response to Comment Letter 15.
- 58B. The figures presented in the DEIS regarding energy projections were provided by Tri-State and SMPA and independently reviewed and verified by the Forest Service's engineering consultant, AESC, for reasonableness/accuracy. See *General Responses 5, 14 and 15* and Response to Comment 41A.



59

POSTED



Holmgrown@aol.com

To: swells@fs.fed.us

05/20/01 08:49 PM

cc:

Subject: SMPC transmission line upgrade

Dear Mr. Steve Wells,

I own land on Wilson Mesa, and to have the existing power line made even more visible by putting taller poles would ruin the whole vista of Wilson Peak. I find it incredibly stupid that the utility company put the present transmission line above ground in the first place. I would strongly encourage you to require the construction of this inevitable upgrade in the transmission line to be underground across all privately owned lands, except where environmentally sensitive areas are involved.

59A

Thank you for your time

Ken Holm

*email forwarded to VPW 5/21/01*

59. Letter from Ken Holm

59A. Comments noted.

POSTED

60



"jason plumber"  
<jrjp@hotmail.com>

05/18/01 02:56 PM

To: swells@fs.fed.us  
cc: jf8240@aol.com  
Subject: Telluride Power Proposals

*email forwarded to VPW 5/21/01*

Mr. Steve Wells,

I am sure that as a resident of the San Miguel area you can appreciate the awesome beauty of this part of the U.S. I have travelled the world for years, and have never seen a more majestic spot, which is the reason I purchased my land on Wilson Mesa.

While I do not currently live on the Mesa, I fully intend to do so one day soon. Needless to say, I was alarmed by the information which has ended up on my desk regarding the power problem in the area. I am all for improving the power situation and it would appear that something must indeed be done. That being said, I think that constructing 80 foot high power poles across private land (some of which happens to be mine), and obscuring one of the most beautiful mountains in the world is not a very rational or far sighted approach to an immediate and pressing problem.

Last time I looked, most of Telluride and surrounding area's economy is driven by tourism. We don't have the Eiffel Tower, or the Statue of Liberty, we have nature at its finest. Mining is not going to pay the bills, and whether you like the crowd of tourists we get all summer or not, the fact of the matter is that they pay the bills. I also happen to be a bit of an environmentalist at heart, so I am loathe to suggest a solution which impacts too much on the native flora and fauna of the area. However, I implore you to help find a solution which allows us to keep the truly magnificent view and accompanying tourist dollars along with it. Those dollars give us nice restaurants, good music, movies, employment and so much more in our little mountain town.

In summary, I am totally opposed to any project which will allow freestanding overground power poles to be constructed and used in the most beautiful part of the entire U.S. There has to be a solution wherein cables or lines can be laid underground and the financing of such is acceptable through one or another means. I am sure that the good people (including yourself) at the US Forest Service will help us come up with a solution we can all live with. Let's hope we don't all have a dirty big pole to look at through the kitchen or hotel room window.

Thank you for your time in this matter.

Sincerely yours,  
Jason Plummer  
Tract 88 - Wilson Mesa  
(775) 833 0503

Get your FREE download of MSN Explorer at <http://explorer.msn.com>

60A

60. Letter from Jason Plummer

60A. Comments noted.



# POSTED

Joseph M. Battersby, D.O.  
1413 North 16th Street  
Phoenix, AZ 85006  
602-258-3569

61

NORWOOD DISTRICT			
APR 23 2001			
DISTRICT MANAGER	ADCT.	INFO.	INIT.
TCE			
VEG. MGMT.			
REC. STAFF			
WILDLIFE CR			
LANDS. MGMT. STAFF			
SN. ADYTECH			
BUS. MGMT. STAFF			
PROMISE CARD			
FILE			

April 17, 2001

Garry W. Edson, District Ranger  
Steve Well, Project Manager  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, Colorado 81423

Dear Garry and Steve:

As a twenty year property owner on Wilson Mesa, I read the data you supplied relative to the Nuela-Telluride Transmission Line Project with interest.

If I interpret correctly although there is available a possible canyon route available to Telluride, those individuals object to its use on esthetic grounds. Certainly, Mesa residents could make the same claim as it refers to our area.

It is my understanding that it is the Telluride area that benefits most from the powers line routing. If that is correct, then I make the following objections to the impact the proposal would have on Wilson Mesa: direct:

1. I have no real direct interest in Telluride's power needs;
2. It seems quite presumptuous to expect us on the Mesa, to "see and pay for" the proposed Wilson Mesa route in view of 1). I feel also in view of 1) that the Telluride interests should assume full responsibility for their needs rather than suggest that "George," (the Mesa residents) should. In my view is their responsibility.
3. It seems absurd that our property values should be decreased as a result of someone else's interests.

Quite seriously put, we oppose the proposal as it involves changes to Wilson Mesa.

Sincerely,

J.M. Battersby, D.O.  
JMB:lld

61A

61. Letter from J.M. Battersby, D.O.

61A. Comments noted. See *General Responses 14 and 15* and Response to Comment 37E.

POSTED

Not  
Deadline

May 29, 2001

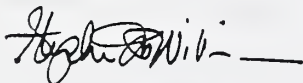
U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, Co. 81423  
Attention: Steve Wells, Project Manager

Re: Nucla to Telluride Transmission Line

Dear Mr. Wells,

As a land and homeowner on the higher elevations of Wilson Mesa, we strongly express opposition to the proposed power line upgrade being placed over the Mesa. This would do great harm to the open, rolling, unprotected acres on the top of the Mesa. There exist valid alternatives to this devastating solution. Place the line in lower protected areas, or underground over the higher elevations.

Sincerely,



Stephen McWilliams  
Lot 92, Wilson Mesa Ranch

NORWOOD DISTRICT	
JUN. 0 4 2001	
DISTRICT RANGER	
TOE	
VEG. MGMT.	
REC. STAFF	
WILDLIFE CR	
LANDS. M.N. STAFF	✓
INFO AD/TECH	
SUB. MGMT. STAFF	
PROMISE CARD	
FILE	

62

62A

**62. Letter from Stephen McWilliams**

62A. Comments noted.



63

POSTED



Karen West  
<westk@nemesis.tucson.saic.com>

05/29/01 09:46 AM

To: swells@fs.fed.us  
cc: westk@nemesis.tucson.saic.com,  
iversone@nemesis.tucson.saic.com  
Subject: Comments on Power Lines across Wilson Mesa

Dear Mr. Wells,

My husband and I are property owners on Wilson Mesa and would like to register our opposition to the potential 80-foot power transmission lines crossing Wilson and other mesas.

My husband and I had hoped to build on our land (parcel 86 on Anderson Road), move there full time, and thus contribute to the local economy. A large part of our desire to do so was based on the scenic beauty and the wildlife in the area. I believe that 80-foot power lines, even at some distance from our property, would greatly impact our desire to be in the area.

Apart from the personal impact, there are fewer and fewer beautiful natural areas in the continental United States that are not despoiled by power lines. Mount Wilson and the surrounding area is spectacularly beautiful, and I believe that we owe it to ourselves and future generations to keep it that way. Part of keeping it that way includes putting unsightly powerlines underground whenever possible.

Granted, there must be power transmission lines, but we strongly urge that they be placed underground. This may be inconvenient for San Miguel Power Company and Tri-State Transmission, but they will not suffer financially. The cost will be passed on to the consumers of the electricity. It seems fair for all users to share this cost rather than to adversely affect only the mesa residents.

Thank you for your attention,  
Karen West  
Evan Iverson

*Forwarded to UPW  
5/29/01 via email.  
S*

63A

63. Letter from Karen West

63A. Comments noted. See *General Response 15* and Response to Comment 37E.

64

POSTED  
PMAHLED

5/29/01

NORWOOD DISTRICT			
JUN 04 2001			
	ACCT.	INFD.	INT.
DISTRICT RANGER			
ICE			
VEG. MGMT.			
REC. STAFF			
WILDLIFE			
LANDS. MGMT. STAFF			
SRG ADTECH			
VEG. MGMT. STAFF			
PROMISE CARD			
FILE			

May 12, 2001

U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, CO 81423  
Attn: Steve Wells, Project Manager

RE: Nucla to Telluride Transmission Line

Dear Mr. Wells:

As a landowner on Wilson Mesa, we are registering our opposition to the proposed power line upgrade going over our mesa.

Our feelings are that all power lines should be put underground at the expense of the company.

Sincerely,

*A. Evan Iverson*

64A

64. Wilson Mesa Residents - A. Evan Iverson

Comments noted. See *General Responses 14 and 15*.



**LAKES**  
Lakes Gaming, Inc.

130 Cheshire Lane, #101

Minnetonka, MN 55305

phone: (952) 449-9092

fax: (952) 449-9353

POSTED

65

NORWOOD DISTRICT			
MAY 29 2001			
	ACCT.	INFO.	INT.
DISTRICT NUMBER			
TCE			
VEG. MGMT.			
REG. STAFF			
WILDLIFE			
LANDS, W/ STATE			
ENR AD TECH			
SUB. MGMT. STAFF			
PROMISE CARD			
FILE			

May 23, 2001

Mr. Steve Wells  
U.S. Forest Service  
Norwood Ranger District Office  
Post Office Box 388  
Norwood, Colorado 81423

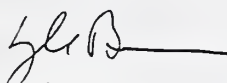
Dear Mr. Wells:

As a landowner on Wilson Mesa, I am registering my opposition to the proposed power line upgrade going over our mesa.

My feeling is that all the power lines should be put underground at the expense of the company.

65A

Sincerely,



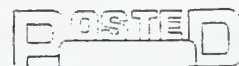
Lyle Berman  
Chairman & CEO

LB/jh

www.lakesgaming.com

**65. Wilson Mesa Residents – Lyle Berman**

Comments noted. See *General Responses 14 and 15.*

66

Special Vehicles

May 22, 2001

U.S. Forest Service  
Norwood Ranger District  
P.O. Box 388  
Norwood, CO. 81423  
Attn: Steve Wells, Project Manager

NORWOOD DISTRICT			
MAY 29 2001			
	ACCT.	INFO.	INT.
DISTRICT RANGER			
VICE			
VEG. MGMT.			
REC. STAFF			
WILDLIFE			
LANDS, NAT. RES.			
SNO. ADVICE			
PUB. MGMT.			
PROUSE CASE			
FILE			

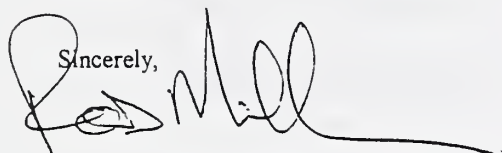
RE: Nucla to Telluride Transmission Line

Dear Mr. Wells:

As a landowner on Wilson Mesa, we are registering our opposition to proposed power line up grade going over our mesa.

Our feelings are that all power lines should be put underground at the expense of the company.

66A

Sincerely,  
  
 Rod Millen

Rod Millen Special Vehicles  
7575 Reynolds Circle, Huntington Beach, CA 92647 Tel (714) 847-2111 Fax (714) 841-6839

**66. Wilson Mesa Residents – Rod Millen**

Comments noted. See *General Responses 14 and 15*.



POSTED

**NORWOOD DISTRICT**

MAY 24 2001

	DOCT.	REG.	INT.
DIST.			
TICE			
REC.			
REG.			
LAWYER			
LEGAL ADVICE			
LEGAL ADVICE			
PHYSICIAN CARD			
FILE			

U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, CO 81423  
Attn: Steve Wells, Project Manager

Dear Mr. Wells:

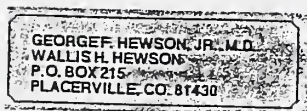
67A

**Our feelings are that all power lines should be put underground at the expense of the company.**

Sincerely,

ely,  
George F. Newson & Co. N.Y.  
Hallie H. Newson

TRACTS 25, 31, 32  
WILSON MESA RANCH



P.S. : LANDOWNERS HAVE RIGHTS AND OUR GOVERNMENT SHOULD PROTECT THEM AND OUR LAND. DO YOUR JOB!

67B

**67. Wilson Mesa Residents - George F. Hewson, Jr., M.D., Wallis H. Hewson**

Comments noted. See *General Responses 14 and 15*.

POSTED

NORWOOD DISTRICT			
MAY 24 2001			
	ADCT.	#PO.	ONT.
DISTRICT MANAGER			
TCE			
VEG. MGMT.			
REC. STAFF			
WELDER			
LANDS. MGR. STAFF			
SO. AD. TECH.			
BUS. MGMT. STAFF			
PROJ. MGMT.			
FILE			

68

May 12, 2001

U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, CO 81423  
Attn: Steve Wells, Project Manager

RE: Nucla to Telluride Transmission Line

Dear Mr. Wells:

As a landowner on Wilson Mesa, we are registering our opposition to the proposed power line upgrade going over our mesa.

Our feelings are that all power lines should be put underground at the expense of the company.

68A

Sincerely,

*Sandra Arisais*  
2342 East Anderson Road  
#78 Wilson Mesa  
PO Box 285  
Placerville CO 81430

68. Wilson Mesa Residents – Sandra Arvisais

Comments noted. See *General Responses 14 and 15*.



69

POSTED

NORWOOD DISTRICT	
MAY 24 2001	
DISTRICT	
OFFICE	
RECEIVED	
FILE	
WELLS	
LAKE	
SKI ADT	
SUB. MOUNTAIN	
PROMISE CARD	
FILE	

May 12, 2001

U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, CO 81423  
Attn: Steve Wells, Project Manager

RE: Nucla to Telluride Transmission Line

Dear Mr. Wells:

As a landowner on Wilson Mesa, we are registering our opposition to the proposed power line upgrade going over our mesa.

Our feelings are that all power lines should be put underground at the expense of the company.

Sincerely,

*Susan Hanley - CoA*

69A

69. Wilson Mesa Residents - Susan Hartley-Coll

Comments noted. See *General Responses 14 and 15*.

70

POSTED

May 12, 2001

U.S. Forest Service  
 Norwood Ranger District Office  
 P.O. Box 388  
 Norwood, CO 81423  
 Attn: Steve Wells, Project Manager

RE: Nucla to Telluride Transmission Line

Dear Mr. Wells:

As a landowner on Wilson Mesa, we are registering our opposition to the proposed power line upgrade going over our mesa.

Our feelings are that all power lines should be put underground at the expense of the company.

Sincerely,




NORWOOD DISTRICT	
MAY 22 2001	
	REC'D. INFO. UNIT.
ADMINISTRATIVE	
GENERAL	
RECORDS	
TRAINING	
LABORATORY STAFF	
STUDENT TECH	
MANAGEMENT STAFF	
TRAINING COORD	
FILE	

70A

**70. Wilson Mesa Residents - Michael A. Walus, Lynne Walus**

Comments noted. See *General Responses 14 and 15*.



71

POSTED

NORWOOD DISTRICT			
MAY 22 2001			
	ACCT.	INFO.	INT.
DISTRICT RANGER			
TCE			
VEG. MGMT.			
REC. STAFF			
WILDLIFE CR			
LANDS. MGMT. STAFF			
ERG AD/TECH			
WILDLIFE MGMT. STAFF			
PROMISE CARD			
FILE			

May 12, 2001

U.S. Forest Service  
 Norwood Ranger District Office  
 P.O. Box 388  
 Norwood, CO 81423  
 Attn: Steve Wells, Project Manager


RE: Nucla to Telluride Transmission Line

Dear Mr. Wells:

As a landowner on Wilson Mesa, we are registering our opposition to the proposed power line upgrade going over our mesa.

Our feelings are that all power lines should be put underground at the expense of the company.

Sincerely,

  
 Landowner

71A

**71. Wilson Mesa Residents - Jason Omes**

Comments noted. See *General Responses 14 and 15*.

POSTED

NORWOOD DISTRICT			
MAY 21 2001			
	ADVIS.	APPROV.	INIT.
DISTRICT MANAGER			
VICE			
VEG. MGMT.			
VEG. STAFF			
WILDLIFE			
LANDS. MGMT. STAFF			
ENR. AD/TECH			
PLUG. MGMT. STAFF			
PROMISE CARD			
FILE			

72

May 12, 2001

U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, CO 81423  
Attn: Steve Wells, Project Manager

RE: Nucla to Telluride Transmission Line

Dear Mr. Wells:

As a landowner on Wilson Mesa, we are registering our opposition to the proposed power line upgrade going over our mesa.

Our feelings are that all power lines should be put underground at the expense of the company.

72A

Sincerely,

*Leigh + John Hyman*  
*lot 34*

*I now look out my window and see miles of ugly existing power lines, along the beautiful landscape. These are high enough to stand out, but 80 ft. high voltage power lines will be a horrible sight! Why should you have the right to ruin Wilson Mesa Ranch's gorgeous terrain, when you can put these lines underground — if there is a need to upgrade this line. It will be safer too!*

72. Wilson Mesa Residents - Leigh and John Hyman

Comments noted. See *General Responses 14 and 15*.



73

POSTED

May 12, 2001

U.S. Forest Service  
 Norwood Ranger District Office  
 P.O. Box 388  
 Norwood, CO 81423  
 Attn: Steve Wells, Project Manager

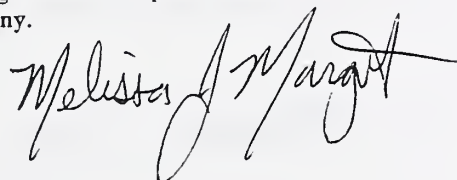
RE: Nucla to Telluride Transmission Line

Dear Mr. Wells:

As a landowner on Wilson Mesa, we are registering our opposition to the proposed power line upgrade going over our mesa.

Our feelings are that all power lines should be put underground at the expense of the company.

Sincerely,



73A

NORWOOD DISTRICT	
MAY 23 2001	
	ACCT. INFO. INT.
DISTRICT MANAGER	
TCE	
W&B MGMT.	
REC. STAFF	
WILDLIFE	
LANDS. MGMT. STAFF	
REG. AD TECH	
PUB. MGMT. STAFF	
PROPOSED CARD	
FILE	

73. Wilson Mesa Residents - Melissa J. Margetts

Comments noted. See *General Responses 14 and 15*.

74

**U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, CO 81423  
Attn: Steve Wells, Project Manager**

Dear Mr. Wells:

Our feelings are that all power lines should be put underground at the expense of the company.

Sincerely,

Stan Mayhew

74A

NORWOOD DISTRICT

MAY 23 2004

DISTRICT \_\_\_\_\_  
TCE \_\_\_\_\_  
VEO, MGMT. \_\_\_\_\_  
REG. STAFF \_\_\_\_\_  
WALL STREET \_\_\_\_\_  
LAWYER, HON. STAFF \_\_\_\_\_  
BRI. ADM. STAFF \_\_\_\_\_  
BUS. MGMT. STAFF \_\_\_\_\_  
PROCESSES CARD \_\_\_\_\_  
FILE \_\_\_\_\_

**74. Wilson Mesa Residents - Steve Margetts**

Comments noted. See *General Responses 14 and 15*.



75  
**POSTED**

May 12, 2001

U.S. Forest Service  
 Norwood Ranger District Office  
 P.O. Box 388  
 Norwood, CO 81423  
 Attn: Steve Wells, Project Manager

RE: Nucla to Telluride Transmission Line

Dear Mr. Wells:

As a landowner on Wilson Mesa, we are registering our opposition to the proposed power line upgrade going over our mesa.

Our feelings are that all power lines should be put underground at the expense of the company.

Sincerely,

*Don-Michael Tucci, D.C.*

75A

NORWOOD DISTRICT	
MAY 24 2001	
	ACCT. INFO. INT.
DISTRICT RANGER	
TCE	
VEG. MGMT.	
REC. STAFF	
FIELD OFFICER	
LANDS. MGR. STAFF	
SRI AD TECH	
BUS. MGMT. STAFF	
PROMISE CARD	
FILE	

75. Wilson Mesa Residents – Jon-Michael Tucci, D.C.

Comments noted. See *General Responses 14 and 15*.

76

POSTED

May 12, 2001

U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, CO 81423  
Attn: Steve Wells, Project Manager

RE: Nucla to Telluride Transmission Line

Dear Mr. Wells:

As a landowner on Wilson Mesa, we are registering our opposition to the proposed power line upgrade going over our mesa.

Our feelings are that all power lines should be put underground at the expense of the company.

76A

Sincerely,

*Elizabeth J. Miller (lot 4)*

NORWOOD DISTRICT	
MAY 31 2001	
DISTRICT MANAGER	_____
ICE	_____
VEG. MGMT.	_____
REC. STAFF	_____
WILDLIFE	_____
LANDS. MGMT. STAFF	_____
ENV. MGMT.	_____
VEG. MGMT. STAFF	_____
PROMISE CARD	_____
FILE	_____

**76. Wilson Mesa Residents - Elizabeth G. Miller**

Comments noted. See *General Responses 14 and 15*.



77

POSTED

NORWOOD DISTRICT	
MAY 30 2001	
	ACCT. REG. INT.
DISTRICT RANGER	
VICE	
VEG. MGMT.	
REC. STAFF	
WILDLIFE	
LANDS. MGMT. STAFF	
PROG. AD TECH	
BUS. MGMT. STAFF	
PROMISE CARD	
FILE	

May 12, 2001

U.S. Forest Service  
 Norwood Ranger District Office  
 P.O. Box 388  
 Norwood, CO 81423  
 Attn: Steve Wells, Project Manager

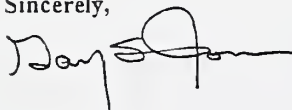
RE: Nucla to Telluride Transmission Line

Dear Mr. Wells:

As a landowner on Wilson Mesa, we are registering our opposition to the proposed power line upgrade going over our mesa.

Our feelings are that all power lines should be put underground at the expense of the company.

Sincerely,



77A

**77. Wilson Mesa Residents - Gary D. Jones**

Comments noted. See *General Responses 14 and 15*.

POSTED

NORWOOD DISTRICT			
MAY 29 2001			
	ACCT.	INFO.	UNIT.
DISTRICT ASSIGNED			
YCE			
VEH. MAINT.			
REC. STAFF			
WILDLIFE			
CARDS, MAIL STAFF			
SIG AD TECH			
BUS. UNIT, STAFF			
PROMISE CARD			
FILE			

78

May 12, 2001

U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, CO 81423  
Attn: Steve Wells, Project Manager

RE: Nucla to Telluride Transmission Line

Dear Mr. Wells:

As a landowner on Wilson Mesa, we are registering our opposition to the proposed power line upgrade going over our mesa.

Our feelings are that all power lines should be put underground at the expense of the company.

Sincerely,

*R. L. R. Debec*  
*(312) 543-6883 mobile #*

78

**78. Wilson Mesa Residents – Robert R. Dubac**

Comments noted. See *General Responses 14 and 15*.



79

H. CHARLES PRICE  
15660 NORTH DALLAS PARKWAY, SUITE 300  
DALLAS, TEXAS 75248

POSTED

*Net  
Deadline  
or*

May 30, 2001

Mr. Steve Wells  
Project Manager  
U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, CO 81423

Dear Mr. Wells:

I have reviewed the Draft Environmental Impact Statement for the Nucla-Telluride Transmission Line Project.

My wife and I own 440 acres at the confluence of Bilk Creek and the San Miguel river, which includes land on the north of Sunshine and Wilson Mesas. The project, as currently proposed, does not cross our property, however the taller transmission line towers may well impinge on our views to the south. We therefore share other landowners' concerns that the new line will affect our vistas and, more generally, represents a significant opportunity to restore an already compromised landscape.

Having reviewed the DEIS and some of the correspondence related to the project, it seems to me the main issue boils down to who should bear the increased cost of burying the line as it crosses Specie, Wilson and Sunshine mesas. (I don't mean to imply that this possibility shouldn't be considered on other sections of the project; however, as the DEIS suggest, the "built landscape" may more easily tolerate the above ground lines in these areas.) Tri-State's policy seems to be that this cost is for the landowners.

NORWOOD DISTRICT	
JUN 04 2001	
	ANST. INFO. INT.
DISTRICT RANGER	
ICE	
VEH. MGMT.	
REC. STAFF	
WILDLIFE	
CAMPS	
BRAD	
BULL. L.	
PROMIS	
FILE	

79A

Tri-State's policy must assume that current easement rights can accommodate the project and it complies with the applicable land use codes. Based on the correspondence I've seen, this is not the likely case. Therefore, I think it completely fair to ask that Tri-State and the various other beneficiaries of the upgrade, including the rate-payers, share in the increased cost of burying the line. The report (see p. 3 of the discussion on distributed generation alternatives) suggests that the benefits of the new line will extend well beyond the Telluride area, which consumed in 1999 only 22 MW of 690 MW available on the grid. In any case, the landowners on the mesas should not have to subsidize the new line's beneficiaries with the loss of their vistas.

A final observation: my guess is that the \$10 to 12 million estimated as the cost of burying the power line would probably be more than adequate equity to support financing for the remainder of the cost of one of the distributed generation proposals. This is worth keeping in mind even though the DEIS may pose good arguments against this option (I don't think ice fog in Fairbanks is one of them).

We recognize the need for stable and reliable power service for the Telluride region that the power line upgrade will provide. The benefits of the upgrade must be balanced against the cost of avoiding becoming part of the "built landscape". My guess is that when the dust settles, Tri-State, WAPA, and PSCC should bear that cost.

Sincerely,



H. Charles Price

79A

**79. Letter from H. Charles Price**

79A. Comments noted. See *General Responses 14 and 15* and Response to Comment 37E.

*This page left blank intentionally.*



80

POSTED

NORWOOD DISTRICT			
APR 19 2001			
	ADPT.	INFO.	INIT.
CONTRACT RANGER			
ICE			
VEH. MGMT.			
REC. STAFF			
WADSWORTH			
LANDS. MGMT. STAFF			
PR. ADTECH			
BUD. MGMT. STAFF			
PROMISE CARD			
FILE			

J. D. Moore  
P.O. Box 395  
Telluride, CO. 81435

U.S. Forest Service  
Norwood Ranger District  
1150 Forest St  
P.O. Box 388  
Norwood, CO 81423

Dear Ranger,

Thank you for the information concerning the power transmission upgrade project. As a home owner and part time resident of Sunshine Mesa, I am very much in favor of the power transmission reliability upgrade. My comments on routing and generation alternatives follow.

**Routing Alternatives:** Since the existing Nucla - Telluride line is 50 years old, essentially all of the current landowners bought their property with full knowledge of the power line and right of way. Therefore, use the existing routing and don't tear up new right of ways. The visual impact of the taller poles is not significant and as was pointed out in the report, the private property owners have the ability to pay to have it put underground if they want. My neighbors and I brought power distribution to Sunshine Mesa underground at our own expense. The most significant visual impact in my opinion is the crossing of the canyons which would be very difficult to underground.

**Distributed Generation Alternative:** This is a very bad idea. As a retired Engineer who has been responsible for the design, operation and management of DG units, I can state the following:

- The economics will probably be even worse than the values presented in the report because of the small size of the units and will only get worse as fuel prices increase in the future.
- **I do not want to pay higher electrical bills because someone can't do economics.**
- Not only is the "large" unit on the small side for good capital utilization, the noise levels will frequently be higher than presented in the chart because of safety valves lifting or malfunctioning equipment.
- The problem of ice fog during parts of the winter cannot be avoided.
- Finally, the reliability of a small generation station that only operates part of the time is questionable, but we all know when it would fail....at the worst possible time.

Sincerely,

*J. D. Moore*  
Jerry D. Moore  
Sunshine Mesa

80A

80B

80. Letter from Jerry D. Moore

80A. Comments noted. As reported in the EIS, however, the increased height of the poles is considered significant on the mesas due to the potential for the lines and poles to obstruct scenic views and be visible above the aspens.

80B. Comments noted. See Letter 6 response to comments.

81

POSTED



"Robert Kammer"  
<rkammer@independe  
nce.net>

To: <swells@fs.fed.us>  
cc:  
Subject: DEIS for the Nucla-Telluride Transmission Line Project

05/31/01 12:26 PM

Dear Mr Wells,

As residents of the mid Ilium Valley In San Miguel County Colorado, we feel the DEIS for this project does not adequately address the very real issues affecting the environment in our area. The current transmission lines in the Ilium valley have a very significant negative impact in our area. Just because the lines are there at the present time does not make the situation Ok. This valley is one of the most scenic places in the country, and the transmission lines shouldn't have been placed here in the first place.

We would like to comment specifically on the extensive comparisons in the DEIS between the Norwood-Sunshine and Norwood-Telluride options. The report seems to assume that the Norwood-Sunshine route is somehow preferable, but totally fails to add the impact from Sunshine station to Telluride station. If you add the Sunshine-Telluride station segment, which is necessary, then the total length and impact are clearly greater than the much more direct Norwood-Telluride route. More properties would be impacted by the longer, circuitous Norwood-Sunshine-Telluride routing.

Another important issue to consider is placing the transmission lines underground. This seems to be a considered option for both of the routes proposed. If this is an option for the Norwood-Sunshine and/or the Norwood-Telluride routes, why is it not considered for the Sunshine station to Telluride station route through the Ilium valley? We do not like being discriminated against in this regard. When the transmission lines were first put in the Ilium valley, the technology to put them underground did not exist. It does now and should be mandated by the county and the Forest Service. We realize full well that this is a costly option; however it would seem to be much easier in the nearly flat terrain of the Ilium valley than the rest of the proposed routing. We should put more value on the impact to our incredibly beautiful land, and not let Tri-State dictate what is done. We read their policy on putting transmission lines underground. The policy needs to be changed; they act like it came from God which is not the case.

Our last comments regard the selection of the Ilium valley as a site for a regional generation site. The Ilium valley has been the dumping site for the all the facilities no one else wants in the county, ie Telluride Gravel, County jail, industrial park and garbage dumping. We have endured enough of this, and feel some other areas need to share the blight.

Thank you for listening to our thoughts.

Carol and Bob Kammer  
900 County Rd 63J  
Telluride, CO 81435

*via forward to vpw 6/1/01  
email. SW*

81A

81B

81C

81. Letter from Robert Kammer

81A. The proposed project would not entail making any modifications to the existing transmission system in Ilium Valley between the Sunshine and Telluride Substations. Located along the Norwood-Sunshine Alternative, the proposed 115 kV line would terminate at the Sunshine Substation. The existing line between Sunshine and Telluride would continue to operate as a 69 kV system.

81B. As noted above in 81A, the existing system between the Sunshine and Telluride Substations are not part of this project and no changes to the existing 115 kV system would occur between these two substations.

81C. Comments noted.



POSTED

82



David Sandell  
<dsandell@worldnet.att.net>

To: swells@fs.fed.us  
cc:  
Subject: energy proposals

04/03/01 08:06 PM

Please respond to  
dsandell

Dear Mr. Wells:

I recently received information regarding the proposed energy sources and transmission in Montrose and San Miguel Counties. I am an owner of Top of the World H, which has a 69kV line and a substation located on one edge of the property. I have a few questions regarding the proposals.

82A

-By what jurisdiction is Tri-State able to change the existing easements from 25' to 75' or 100' feet, accommodating the proposed 115kV line?

-Regarding the underground construction of lines for Specie, Wilson, and Sunshine Mesas, the brochure indicates that additional costs for such construction would be carried by "local agencies" or "land owners." Could you provide some clarity about what "local agencies" might be involved? Furthermore, I'd like to know the status of current discussions about those costs?

82B

-I favor any of the DG alternatives. However, many questions remain unanswered. First, what entity would manage a DG alternative? Second, how would it be financed? And finally, how viable is this proposal in view of Tri-State's lack of support?

82C

The proposals have a direct impact on my land, the aesthetic value of the region, and of course, the energy needs of a growing community. I appreciate your sending information that indicates what appears to be long-term, proactive thinking. I would like to know how I might become more involved in local discussions of these proposals.

82D

Finally, I thank you in advance for your response to above questions.

Yours,

David Sandell  
dsandell@worldnet.att.net

P.S. I intend to put a hard copy of this letter in the mail.

82. Letter from David Sandell

- 82A. The width of a transmission line easement depends on voltage (e.g. 69 kV, 115 kV, 220 kV, etc.). Tri-State's right-of-way standards are based on guidelines set forth by RUS in the 'Design Manual for High Voltage Transmission Lines', Bulletin 1724.E-200, Revised 1992.
- 82B. Tri-State must obtain a Special Use Permit from Montrose and San Miguel Counties. Consideration of landowner issues and concerns will be addressed as part of the local county permitting process. Should the Counties deny a permit for the project, Tri-State may appeal the decisions with the CPUC under the provisions of House Bill 01-1195.
- 82C. As stated in the EIS, Section 2.1.2, Tri-State would not finance nor build a distributed generation facility in lieu of the proposed 115 kV transmission line. Support and financing would need to be acquired elsewhere. It should be recognized that should a distributed generation facility be built and operated solely for the Telluride region, the costs of construction and operation would most likely have to be absorbed by the local population. The viability of this proposal would consequently depend upon the interests and support of energy developers, local residents and ratepayers.
- 82D. Comments noted. Persons providing comments on the DEIS will be on the mailing list for the FEIS. Persons interested in participating in the Counties' Special Use Permit Application hearings for the project should contact the San Miguel and Montrose County Planning Departments for more information on hearing schedules.

POSTED

83



"Donnald Rasmussen"  
<paradoxdata@interfo  
ld.com>

To: <swells@fs.fed.us>

cc:

Subject: Nucla-Telluride Transmission line - Draft EIS

04/07/01 10:28 AM

Please respond to  
paradoxdata

Steve Wells, Project Manager  
Norwood Ranger District  
P.O. Box 388  
Norwood, CO 81423

Dear Mr. Wells:

My company would like to receive a copy of the "Draft Environmental Impact Statement for Nucla-Telluride Transmission Line Project, vols I and II, March, 2001. This project has direct implications for our work in that region. I got to see a copy at the Colorado BLM office in Lakewood and want to compliment your high quality and completeness of the study.

83A

Thank you. Sincerely,

Donald L. Rasmussen  
Plateau Exploration, Inc.  
1645 Court Place, Ste. 312  
Denver, CO 80202-4507

Done  
4/10/01  
gw

83. Letter from Donald L. Rasmussen

83A. Comments noted.



84

POSTED

# SAN MIGUEL COUNTY

## BOARD OF COMMISSIONERS

VERN EBERT

ELAINE FISCHER

ART GOODTIMES

May 17, 2001

U.S. Forest Service  
 Norwood Ranger District Office  
 P.O. Box 388  
 Norwood, Co 81423  
 Attn: Steve Wells, Project Manager

Dear Mr. Wells:

The San Miguel County Board of Commissioners request that the deadline for comments on the Draft Environmental Impact Statement (DEIS) for the Nucla-Telluride Transmission Line Project be extended one month, until June 30, 2001.

84A

Thank you in advance for your consideration of this request.

Very truly yours,

  
 Vern Ebert  
 Chair

NORWOOD DISTRICT			
MAY 21 2001			
	ASST.	INFO.	INT.
DISTRICT MANAGER			
VICE			
VEG. MGMT.			
REC. STAFF			
WILDLIFE			
LAND MGMT. STAFF			
ENV. ADVICE			
BUS. MGMT. ST. ST.			
PROMOTION CARD			
FILE			

*Reply made  
5/29/01  
SW*

P.O. BOX 1170 • Telluride, Colorado 81435 • (970) 728-3844 • FAX (970) 728-3718



United States  
Department of  
Agriculture

Forest  
Service

Norwood  
Ranger District

POSTED

1150 Forest Street  
P. O. Box 388  
Norwood, CO 81423  
970-327-4261

84

File Code: 2720/1950-3

Date: May 29, 2001

Mr. Vern Ebert  
Chair  
San Miguel County Board of Commissioners  
PO Box 1170  
Telluride, CO 81435

Dear Mr. Ebert,

Thank you for your letter dated May 17, 2001 requesting the deadline for comments on the Draft Environmental Impact Statement (DEIS) for the Nucla-Telluride Transmission Line Project be extended to June 30, 2001.

I have given your request careful consideration. I have already extended the comment period 15 days beyond the 45-day comment period in our regulations to its current ending date of May 31, 2001. This has given the public 60 days to read, question, and comment on the DEIS. We published the notice of availability in the Federal Register and mailed approximately 1100 copies of the DEIS to the public and local, state, and federal agencies on March 30, 2001. In addition to your request, I have only received one other request to extend the comment period. While I am sensitive to the need for the public to have adequate time for comment on a federal land use proposal, I must also be sensitive to requests from the public and proponent to not prolong the process unduly. We are already receiving comments from those individuals and organizations wishing to comment.

For these reasons, I regret I am unable to approve your request for an extension of the comment period. I am confident that those individuals, organizations, and agencies who wish to comment on the DEIS will do so within the 60-day period allowed.

I look forward to receiving your comments.

Sincerely,

/s/ Steve Wells (for)  
GARRY W. EDSON  
District Ranger

Cc: FHO  
View Point West  
T. Pfifer, BLM  
D. Rankin, RUS

*Fixed to SMC  
5/29/01  
SW*



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**84. Letter from the San Miguel County Board of Commissioners**

84A. See response from the U.S. Forest Service.

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85.

**Virginia Lupoli Esq.**

P.O.Box 237  
Cold Spring Harbor, New York 11724  
631 385-9354  
Fax 631 385-4477

May 24, 2001

U.S. Forest Service  
Norwood Ranger District Office  
P.O. Box 388  
Norwood, Co 81423  
Att: Steve Wells, Project Manager

Re: Nucla to Telluride Transmission Line

Dear Mr. Wells:

<b>NORWOOD DISTRICT</b>	
MAY 29 2001	
DISTRICT ADDRESS	
FILE	
VEG. MGMT.	
REC. STAFF	
WILDLIFE CR.	
CARDO. MGMT. STAFF	✓
SR. AD TECH	
SUB. COM. STAFF	
PROMISE CARD	
FILE	

I have received and read the impact statement for the proposed transmission line from Nucla to Telluride by Tri-State Generation and Transmission Association. I am a new property owner at Wilson Mesa (lot 68). The proposed placement of overhead power line will seriously detract from the beauty of the Mesa and will have a serious economic impact on my land. I had purchased this small parcel in Oct. 1999 in the wonderful, pristine condition that drew me to that spot, so much as to stir in a me a hope to move there permanently within the next 2 years. Now I find that the splendor of the place may be irretrievably marred by high power electric lines being spread across the landscape. In this day of conservation and renewed appreciation for efforts toward preserving the land in conditions as close to their original state as possible, it seems incredible that anyone would even think of erecting 80 foot towers carrying high voltage power-lines and spreading them across these incredible mountain tops and mesas!

85A

Of course you wouldn't even consider placing such towers in the more populated and affluent areas' of Telluride, or for that matter, in your own backyard! It seems obvious too, the health, economic and aesthetic effects that these power-lines may bring the individuals whose lands the lines transverse are also discounted. To permit this outrageous proposal is like allowing an irresponsible child (a/k/a the San Miguel Power Authority, or "SMPA") to play with an enormous erector set and permanently leave behind ugly wires and contraptions spread across the landscape in total disregard for the effect the mess has on every innocent person or place damaged in the wake of this self-

85B

85

serving tantrum. You, the Forest Service, are charged with the responsibility of protecting the vast lands under your care and establishing the sometimes-harsh rules by which untoward industrialist companies (like Tri-State or SMPA) must be regulated. Those of us with property in the path of these lines, deserve more consideration and better protection than the Forest Service is providing.

85B

This is not to minimize the necessity of addressing the power concerns in our area. I am fully cognizant of this reality. The challenge that is presented here is how to provide the energy that is needed AND protect everyone's environment at the same time. Given the fact that the power must get from Nucla to Telluride, the actual plotting of the power lines placement may be limited to just a few alternatives. The means by which this is route achieved and its concomitant aesthetic and economic effects on people and the environment, is totally within your control. What you do here will be viewed by this generation as well as many generations to come. That is why I believe that further study should be given to the actual placement of these lines and, once that choice is made, it is an absolute necessity that these lines be placed underground rather than permit the overhead steel monstrosities, scaring our countryside for decades to come.

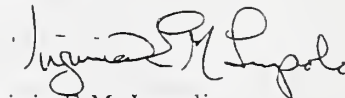
85C

In the past ecological mistakes were made due to lack of concern, sheer stupidity or the inability of technology to keep up with demands of progress. Hopefully, we have progressed beyond such continued foolishness. The cost of such underground lines is not so exorbitant that it should not be born by Tri-State. (despite their convenient "policy" that it be the landowner must pay the increased costs of any underground construction. See Draft of Environmental Impact Summary, March 2001, page 17.) There is no defensible reason not to require that these lines be hidden underground.

85D

The Forest Service has the opportunity to set an example for the rest of the country as to how to combine our need for progress and protect our resources at the same time. The beauty of these incredible mountains is as valuable a resource as any other you may have to protect.

Very truly,



Virginia E.M. Lupoli

cc. Mr. Lyle Laverty                      Sandra Mazzocchi  
Rocky Mountain Regional Director      Wilson Mesa Homeowners  
P.O. Box 25127                              Ass'n  
Lakewood, Co. 80225                      C/O PO Box 2710  
   Telluride, Co. 81435

Ms. Ann Bartuska  
National Director Forest Service  
US Dept of Agriculture  
Sydney R. Yates Federal Building  
201 14<sup>th</sup> Street S.W.  
Washington, D.C. 20250

85. Letter from Virginia Lupoli Esq.

- 85A. Comments noted. Please note that Tri-State has corrected the pole heights to an average height of 70 feet, not 80 feet.
- 85B. The Forest Service's decision-making authority is limited to only those public lands under the jurisdiction of the U.S. Department of Agriculture, Forest Service. National Forest lands potentially affected are located at the eastern extent of the project area. Private land issues are presently being considered by San Miguel County as part of Tri-State's application for a special use permit.
- 85C. The scoping and identification of alternatives took place over a two-year period (1998-1999) and included seven scoping meetings and the initial consideration of a number of routing alternatives. Alternatives considered and eliminated early on in the NEPA process are discussed in Section 2.3 of the EIS and shown in EIS, Volume II, *Plate PROJECT-9*. The corridors between Nucla and Sunshine (i.e. the Nucla-Norwood Northern Alternative and the Norwood-Sunshine Alternative) have been carried forward and considered in detail in the EIS since there is an existing 69kV transmission facility present. Utilization of existing corridors is typically considered in evaluating the routing alternatives for proposed transmission lines. See also *General Response 9* regarding the identification of alternatives under NEPA. Also see EIS Appendix A-1 for additional information on proposed pole designs. Tri-State has proposed single and h-frame wood structures, not steel.
- 85D. See response B above regarding the Forest Service's authority and decision-making role. The Forest Service and BLM have taken no position either in support of, or opposition to, Tri-State's policy. San Miguel County is considering Tri-State's underground policy on private lands as part of the special use permitting process.







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